

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

DEPARTMENT OF TRANSPORTATION

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DOCKET SECTION

QA 29504

Petition of

AMERICA WEST AIRLINES

**for amendment of the Department's
Economic Regulations to limit CRS
Vendor Charges to Booking Fees for
Actual Travel and Permit Termination of
Passive Bookings by Participating Carriers**

Docket No. OST-97-2881-50

Advanced Notice of Proposed Rulemaking

**COMPUTER RESERVATION SYSTEM
(CRS)
REGULATIONS**

COMMENTS OF SOUND TECHNOLOGIES, INC.

Communications regarding this document should be addressed to:

Stanley E. Ansin
President
Sound Technologies, Inc.
1940 116th Avenue, N.E. Suite 15
Bellevue, WA 98004
206-462-5208

Joanne W. Young
David M. Kirstein
Baker & Hostetler, LLP
1050 Connecticut Ave, N.W.
Suite 1100
Washington, D.C. 20036
202-861-1532

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**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

**Petition of
AMERICA WEST AIRLINES**

**for amendment of the Department's
Economic Regulations to limit CRS Vendor
Charges to Booking Fees for Actual Travel
and Permit Termination of Passive Bookings
by Participating Carriers**

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Advanced Notice of Proposed Rulemaking

**COMPUTER RESERVATION SYSTEM
(CRS)
REGULATIONS**

COMMENTS OF SOUND TECHNOLOGIES, INC.

Sound Technologies, Inc. files these comments in support of the Petition for Rulemaking filed by America West Airlines, Inc. proposing two new rules to amend the Department's Computer Reservation System (CRS) rules (14 CFR Part 255). Sound Technologies, which is an independent auditing firm that specializes in auditing of CRS BIDT tapes for airlines, fully supports America West's request that the Department issue a notice of proposed rulemaking for two regulations that would (1) limit CRS pricing practices to charges for bookings that result in

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actual travel and thus prohibit transaction based pricing; and (2) enable a participating airline to prohibit CRS vendors from allowing their subscribers to make passive bookings on that airline. Sound Technologies urges the Department to act under its statutory authority to prohibit unfair methods of competition and unfair and deceptive practices in the marketing of air transportation (49 U.S.C. §41712) and adopt these rules which would save participating carriers millions of dollars in excessive booking fees and dramatically reduce abusive bookings which lead to inventory spoilage and overbooking situations, thus directly harming consumers.

I. ANALYSIS OF CRS BOOKING RECORDS SHOW PARTICIPATING CARRIERS ARE BEING CHARGED FOR NUMEROUS IMPROPER BOOKINGS.

Since it was founded in 1992 Sound Technologies, Inc. has assisted numerous airlines through the auditing of CRS BIDT tapes. The firm's principals have extensive experience in public accounting systems, computer sciences and airline marketing, which has provided them with a sophisticated understanding of CRS practices. The auditing software which Sound Technologies has developed establishes various parameters which isolate transactions typically associated with ticketing abuses such as fictitious, duplicate, speculative, high net (churning),

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or passive bookings.¹ This auditing process enables carriers to track CRS bookings and determine which bookings do not relate to an intent by a passenger to travel on the airline. Carriers are also able to analyze CRS booking charges for routes or flights which they do not even operate. Based on the auditing experience of Sound Technologies which covers numerous U.S. and foreign carriers, both large and small, it is apparent the CRSs use their market power to impose fee structures that create a financial reward for the CRS owners as a result of speculative and other improper bookings by travel agents. As the Department just noted in the final parity clause rule, CRSs "do not compete for airline participation and their prices and terms for participation are not disciplined by market forces." 62 Fed. Reg. 59785, November 5, 1997. Thus, the vendors have absolutely no financial incentive to deter these bookings. Rather, they encourage these practices directly through productivity and incentive agreements and indirectly by failing to provide adequate system training to subscribers.

¹ America West identified in its petition six categories of abusive practices which have cost participating carriers millions of dollars in booking fees since the introduction by CRSs of transaction based pricing. These practices are: (1) passive segments where no message is sent to the carrier's internal reservation system and are used to sell seats at fares that are no longer available or to issue a ticket for a higher level of service at a below tariff fare; (2) HK segments which are created when agents use a response code reserved for use by the CRS or the carrier, causing a carrier's internal reservation system to create duplicate reservations; (3) group passives which agents use to create high productivity credits when there are in fact no actual passengers; (4) high net cancellations (churning) where the agent engages in multiple bookings and cancellations of a ticket to extend payment of a deadline or hold a ticket out of inventory for a customer; (5) duplicate bookings where the same passenger is booked for more than one seat on the same flight or on multiple flights at the same time; (6) fictitious names which is a form of speculative booking used by agents to hold seats out of inventory which may never result in a sale and which may be coupled with churning.

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In this connection, Sound Technologies recommends that the Department establish rules of conduct to mandate that CRS vendors provide adequate training and programs for continued education to their subscribers. As the Department has noted in its studies on CRSs, travel agents engage in these unfair and deceptive booking practices to obtain free or reduced charges for their CRS equipment based on productivity and incentive agreements designed by the CRS vendors to maximize the use of their systems. See Department of Transportation, Airline Marketing Practices: Travel Agencies, Frequent Flyer Programs and Computer Reservations Systems at 14, 23 (Feb. 1990).

Sound Technologies provides its services to a substantial number of carriers that reflect a cross-section of the industry from major international airlines to small regional carriers. Accordingly, it has been in a unique position to witness the extent to which CRSs charge airlines for abusive booking transactions. Based on the overall audit experience of these carriers, Sound Technologies is convinced that millions of dollars of carrier segment fee costs constitute payment for these improper bookings which provide no value to the carriers. As detailed in the America West Petition these practices also have a devastating effect on inventory by taking available seats off the market which in turn deprives the airlines of revenue, and by creating overbooking situations, which impose financial penalties on carriers and disrupt passenger travel.

Attached as Exhibits 1-7 is documentation which reflects examples of these abuses, such as, the fraudulent use of Passive Segments to obtain productivity incentives, high net costs (churning) and fictitious and suspect passenger names. In addition, Exhibit 6 demonstrates how

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the CRS vendors are violating the "adequate" information rules set forth in Part 255 of the Department's Economic Regulations published on December 12, 1992. These violations include the lack of flight numbers and flight dates; and the lack of ARC numbers to properly identify the CRS subscriber.

Moreover, as America West explained in its petition, consumers are increasingly booking and cancelling reservations via multi-carrier Internet booking sites as they look for the best deals, make tentative bookings or simply play with the systems. These consumers may generally be unaware that these booking sites are linked to CRSs or that the airlines are paying a fee for each transaction. High net charges are thus becoming a major problem on Internet bookings.² In addition airlines have suffered from a larger percent of no show passengers from Internet bookings, which results in inventory spoilage. As pointed out by America West, the rapid expansion of CRS-based Internet booking engines compels immediate action by the Department to impose a travel based fee system.

II. THE MARKET POWER HELD BY THE CRSs ENABLES THEM TO REJECT VIRTUALLY ALL CARRIER CLAIMS OF IMPROPER BOOKING CHARGES.

CRS conduct toward participating carriers which attempt to challenge charges for these unfair and deceptive booking practices illustrates and underscores the immediate need for America West's proposed rules. First, the carriers must accept the agreements the CRS vendors utilize if they wish to participate in the systems. As the Department has noted, "participating

² Indeed, it is interesting to note that SABRE imposed its cancellation charge policy at the time Travelocity went on-line. Many of Sound Technologies airline clients have experienced an unusually large percentage of cancellations on bookings originating through the Internet.

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carriers have no ability to bargain over the terms of their participation agreements." Computer Reservations System (CRS) Regulations, 57 Fed. Reg. 43780, 43819 (September 22, 1992), hereinafter 1992 Final Rule. Furthermore, although these participation agreements provide procedures for a carrier to dispute an invoice, the CRSs have established unilateral credit request guidelines that fail to recognize most forms of improper bookings as a basis for refund. For example, SABRE's "Handbook" of unilaterally imposed rules authorizes a credit only for a wrong flight number, flight dates or an invalid city pair and insists on full payment for all other booked segments.

This practice by the CRSs is made possible only by the market power the vendors exercise over the participating carriers. In a competitive environment, no carrier would agree to pay for transactions which do not produce revenue and, in many cases, lead to lost revenue and disruption of passenger trips. The position of the CRSs is patently inconsistent with the intent of the Department's rules which were amended in 1992 to require that CRSs make available the BIDT tapes so that carriers could analyze CRS charges and challenge fees for speculative and other bogus bookings. Using the information from these tapes, Sound Technology clients have submitted complete detailed documentation, segment by segment, both on paper and electronic media, supporting claims for invalid bookings. Carriers are frequently under pressure to submit their claims within a relatively short period of time, since the participation agreements typically specify claims must be submitted within a six or twelve month period. However, even though CRSs insist carriers submit very detailed claims, they typically review less than 2% of the documentation submitted, and invariably contend the carriers'

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documentation is insufficient and insist on immediate payment. If the airline requests the CRS perform a proper review and analysis of the completely documented disputed segment data, its request is refused. Attempts by participating carriers to meet and resolve disputed invoices are generally met with unrealistic demands for information and unprofessional treatment of the airline employees.³

Sound Technology's experience has revealed that the eventual credit provided by CRS vendors to qualified disputed segments is between 1 and 3%. Moreover, if the carrier does not immediately pay the amount demanded by the CRS, it is threatened with immediate expulsion from the system which, as the Department has repeatedly found, would be catastrophic for an airline.⁴ Sound Technologies is aware of a number of specific instances where a client airline was threatened by CRS vendors for expulsion from their system, and has observed that CRSs are particularly aggressive towards small carriers which occupy even weaker bargaining positions. For this reason, Sound Technologies strongly urges the Department to establish rules of conduct that would impose a general requirement of good faith and fair dealing on all transactions between the CRS vendors and the participating carriers.

³ SABRE actually asserted in a letter dated March 17, 1997 to the Department's General Counsel that 14 C.F.R. § 255.11 which was imposed to allow CRSs not to serve a free riding carrier which fails to pay a non-discriminatory fee, forces SABRE to cut off service to a carrier that has signed a participation agreement and is paying fees but withholding disputed amounts through the clearinghouse. Neither the text of the rule, nor its history as set forth in 49 Fed. Reg. 11,668 supports SABRE's self-serving interpretation of this rule. Sound Technologies requests that the Department clarify that this rule does not justify termination over a billing dispute.

⁴ Computer Reservations System (CRS) Regulations, 56 Fed. Reg. 12586, 12595 (proposed March 26, 1991); 1992 Final Rule, *supra*, at 43783-4.

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Issuance of the America West proposed rule to limit CRSs to a single fee per segment based on actual travel as reflected in carrier boarding records would directly benefit competition in air transportation by immediately reducing participating carrier distribution expenses through elimination of charges for bookings made by subscribers to meet productivity quotas and other incentives. In addition, this restriction on charges would substantially aid participating airlines in predicting their monthly distribution costs and reduce the current costs associated with monitoring booking charges and seeking to resolve these issues with the CRSs. Significantly, elimination of these practices would also reduce the direct costs and loss of customer goodwill associated with inventory spoilage and overbooking situations which are a direct result of these booking practices and which directly harm airline passengers. In conjunction with America West's proposal, Sound Technologies recommends that the Department impose a rule that would prohibit CRS vendors from providing productivity and incentive arrangements based on any criteria other than actual passenger travel by passengers booked by the agency. At a minimum, the CRSs should be required to desist from advising their subscribers how to achieve levels of required productivity and incentives by utilizing fraudulent booking methods and affirmatively warn agents that such conduct will result in termination of the subscriber agreement.

CONCLUSION

It is imperative that the Department immediately take action to help carriers counter the abusive booking phenomena. This action is compelled by the purpose of the CRS regulations, which is to:

**Sound Technologies, Inc.
Comments to Department of Transportation**

Exhibit of Example of the Use of Passive Bookings

The attached reports reflect an example of the use of Passive Segments. The report on Debonair Travel is in two parts. The first report reflects all segments booked and canceled by Class of Service and by Status Code. Please note that this agency only booked Passive Segments (GK).

The other reports show all segments booked by the agency in detail in the month of June, 1996. Please note that this agency only booked one flight #112 on alternate date 7/3/96 and 7/10/96. The itinerary was from LIM (Lima) to /BOG(Bogata) and from LIM (Lima) to CCS (Caracas). By this means that this agency booked 980 passengers on the two flights. The capacity of the aircraft used by the Airline was a small aircraft seating 20 passengers.

We have also attached a second month, July, 1996 which shows how they used a fictitious passenger name (Smith) to accomplish similar booking activity.

This agency did the same to five other airlines and the CRS Vendor, SABRE was notified and at this date continues to be studying the activity of Debonair Travel.

Sound Technologies Inc. CRSAUDIT Version 4.2 - Wed Sep 25 10:23:28 1996

SANTA AIRLINES

Sabre - Agency Summary Report

JUNE 1996

US 4550188 Q4B2 DEBONIAR TRAVEL INC. # HOUSTON	TX
ST Y B 1960 5056.80	
Totals: 1960 5056.80	
Agency Totals: 1960 5056.80	

Agency Status Distribution

US 4550188 Q4B2 DEBONIAR TRAVEL INC. # HOUSTON	TX
GK B 1960 5056.80	
Totals: 1960 5056.80	
Agency Totals: 1960 5056.80	

Sound Technologies Inc. CRSAUDIT Version 4.2 - Wed Sep 25 10:23:32 1996

SAETA AIRLINES

Sabre Detail for Pseudo City Code Q4B2

JUNE 1996

(US - DEBONIAR TRAVEL INC.)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	Cl	Stat	Acc	TrDate	Locatr
0112	LIMBOG	960703	ABELLA/C/D/	4	10.32	Y B	GKGK	ST	960607	QTJPAS
0112	LIMCCS	960710	ABELLA/C/D/	4	10.32	Y B	GKGK	ST	960607	QTJPAS
0112	LIMBOG	960703	AGUADA/X/C/	4	10.32	Y B	GKGK	ST	960607	QTWQLI
0112	LIMCCS	960710	AGUADA/X/C/	4	10.32	Y B	GKGK	ST	960607	QTWQLI
0112	LIMBOG	960703	AGUDILLA/X/	4	10.32	Y B	GKGK	ST	960607	QTVPAC
0112	LIMCCS	960710	AGUDILLA/X/	4	10.32	Y B	GKGK	ST	960607	QTVPAC
0112	LIMBOG	960703	ALEJANDRO/X	4	10.32	Y B	GKGK	ST	960610	QYMPZF
0112	LIMCCS	960710	ALEJANDRO/X	4	10.32	Y B	GKGK	ST	960610	QYMPZF
0112	LIMBOG	960703	ALTO/C/D/E/	4	10.32	Y B	GKGK	ST	960612	QMYGMK
0112	LIMCCS	960710	ALTO/C/D/E/	4	10.32	Y B	GKGK	ST	960612	QMYGMK
0112	LIMBOG	960703	ALVAREZ/J/J	4	10.32	Y B	GKGK	ST	960607	QTJUER
0112	LIMCCS	960710	ALVAREZ/J/J	4	10.32	Y B	GKGK	ST	960607	QTJUER
0112	LIMBOG	960703	ANDALUCIA/X	4	10.32	Y B	GKGK	ST	960612	QMYCZD
0112	LIMCCS	960710	ANDALUCIA/X	4	10.32	Y B	GKGK	ST	960612	QMYCZD
0112	LIMBOG	960703	APONTE/A/A/	4	10.32	Y B	GKGK	ST	960607	QTKFAV
0112	LIMCCS	960710	APONTE/A/A/	4	10.32	Y B	GKGK	ST	960607	QTKFAV
0112	LIMBOG	960703	APPLES/C/V/	4	10.32	Y B	GKGK	ST	960607	QTXZQW
0112	LIMCCS	960710	APPLES/C/V/	4	10.32	Y B	GKGK	ST	960607	QTXZQW
0112	LIMBOG	960703	BALOG/X/C/V	4	10.32	Y B	GKGK	ST	960607	QTXUIV
0112	LIMCCS	960710	BALOG/X/C/V	4	10.32	Y B	GKGK	ST	960607	QTXUIV
0112	LIMBOG	960703	BARNEY/C/V/	4	10.32	Y B	GKGK	ST	960610	QYNXXG
0112	LIMCCS	960710	BARNEY/C/V/	4	10.32	Y B	GKGK	ST	960610	QYNXXG
0112	LIMBOG	960703	BENTLEY/C/D	4	10.32	Y B	GKGK	ST	960610	QZGHZQ
0112	LIMCCS	960710	BENTLEY/C/D	4	10.32	Y B	GKGK	ST	960610	QZGHZQ
0112	LIMBOG	960703	BERKELEY/C/	4	10.32	Y B	GKGK	ST	960607	QTSHNT
0112	LIMCCS	960710	BERKELEY/C/	4	10.32	Y B	GKGK	ST	960607	QTSHNT
0112	LIMBOG	960703	BERLEY/C/V/	4	10.32	Y B	GKGK	ST	960607	QTMAKH
0112	LIMCCS	960710	BERLEY/C/V/	4	10.32	Y B	GKGK	ST	960607	QTMAKH
0112	LIMBOG	960703	BERT/B/N/J/	4	10.32	Y B	GKGK	ST	960612	RSRZEU
0112	LIMCCS	960710	BERT/B/N/J/	4	10.32	Y B	GKGK	ST	960612	RSRZEU
0112	LIMBOG	960703	BLACK/A/S/I	4	10.32	Y B	GKGK	ST	960607	QTTLZJ
0112	LIMCCS	960710	BLACK/A/S/I	4	10.32	Y B	GKGK	ST	960607	QTTLZJ
0112	LIMBOG	960703	BLACKE/M/M/	4	10.32	Y B	GKGK	ST	960619	SSIPWO
0112	LIMCCS	960710	BLACKE/M/M/	4	10.32	Y B	GKGK	ST	960619	SSIPWO
0112	LIMBOG	960703	BLARNEY/C/V	4	10.32	Y B	GKGK	ST	960610	QYNYLE
0112	LIMCCS	960710	BLARNEY/C/V	4	10.32	Y B	GKGK	ST	960610	QYNYLE
0112	LIMBOG	960703	BLOCK/W/S/R	4	10.32	Y B	GKGK	ST	960607	QTTEMZ
0112	LIMCCS	960710	BLOCK/W/S/R	4	10.32	Y B	GKGK	ST	960607	QTTEMZ
0112	LIMBOG	960703	BLOOMING/C/	4	10.32	Y B	GKGK	ST	960610	QZHTID
0112	LIMCCS	960710	BLOOMING/C/	4	10.32	Y B	GKGK	ST	960610	QZHTID
0112	LIMBOG	960703	BOEING/R/R	4	10.32	Y B	GKGK	ST	960612	QJHEOB
0112	LIMCCS	960710	BOEING/R/R	4	10.32	Y B	GKGK	ST	960612	QJHEOB
0112	LIMBOG	960703	BOOKMAKER/C	4	10.32	Y B	GKGK	ST	960619	SSIAYU
0112	LIMCCS	960710	BOOKMAKER/C	4	10.32	Y B	GKGK	ST	960619	SSIAYU
0112	LIMBOG	960703	BORY/C/D/W/	4	10.32	Y B	GKGK	ST	960607	QTJARM
0112	LIMCCS	960710	BORY/C/D/W/	4	10.32	Y B	GKGK	ST	960607	QTJARM
0112	LIMBOG	960703	BORY/R/C/U/	4	10.32	Y B	GKGK	ST	960607	QTJYYI
0112	LIMCCS	960710	BORY/R/C/U/	4	10.32	Y B	GKGK	ST	960607	QTJYYI
0112	LIMBOG	960703	BROWN/C/T/Y	4	10.32	Y B	GKGK	ST	960607	QTIVLN
0112	LIMCCS	960710	BROWN/C/T/Y	4	10.32	Y B	GKGK	ST	960607	QTIVLN
0112	LIMBOG	960703	BROWNE/B/B	4	10.32	Y B	GKGK	ST	960619	SSJZFB
0112	LIMCCS	960710	BROWNE/B/B	4	10.32	Y B	GKGK	ST	960619	SSJZFB
0112	LIMBOG	960703	BRUCE/H/J/K	4	10.32	Y B	GKGK	ST	960612	QJIVNS
0112	LIMCCS	960710	BRUCE/H/J/K	4	10.32	Y B	GKGK	ST	960612	QJIVNS
0112	LIMBOG	960703	BURDISSO/J/	4	10.32	Y B	GKGK	ST	960612	QMWGWN
0112	LIMCCS	960710	BURDISSO/J/	4	10.32	Y B	GKGK	ST	960612	QMWGWN
0112	LIMBOG	960703	CALLABASA/C	4	10.32	Y B	GKGK	ST	960612	QMYAKV
0112	LIMCCS	960710	CALLABASA/C	4	10.32	Y B	GKGK	ST	960612	QMYAKV
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0112	LIMCCS	960710	CANELAS/X/C	4	10.32	Y B	GKGK	ST	960607	QTKPVJ

0112 LIMBOG 960703 CARNE/S/D/F	4	10.32	Y B GKGK	ST 960610 QZEPKS
0112 LIMCCS 960710 CARNE/S/D/F	4	10.32	Y B GKGK	ST 960610 QZEPKS
0112 LIMBOG 960703 CARNEY/C/V/	4	10.32	Y B GKGK	ST 960610 QZFUND
0112 LIMCCS 960710 CARNEY/C/V/	4	10.32	Y B GKGK	ST 960610 QZFUND
0112 LIMBOG 960703 CARRASQUILL	4	10.32	Y B GKGK	ST 960607 QJXPCY
0112 LIMCCS 960710 CARRASQUILL	4	10.32	Y B GKGK	ST 960607 QJXPCY
0112 LIMBOG 960703 CASEY/R/T/Y	4	10.32	Y B GKGK	ST 960612 RSQGEI
0112 LIMCCS 960710 CASEY/R/T/Y	4	10.32	Y B GKGK	ST 960612 RSQGEI
0112 LIMBOG 960703 CASYE/C/V/B	4	10.32	Y B GKGK	ST 960612 OMVDYV
0112 LIMCCS 960710 CASYE/C/V/B	4	10.32	Y B GKGK	ST 960612 OMVDYV
0112 LIMBOG 960703 CEBOLLA/S/D	4	10.32	Y B GKGK	ST 960610 QYNQZX
0112 LIMCCS 960710 CEBOLLA/S/D	4	10.32	Y B GKGK	ST 960610 QYNQZX
0112 LIMBOG 960703 CHAVEZ/A/W/	4	10.32	Y B GKGK	ST 960607 QTVWEQ
0112 LIMCCS 960710 CHAVEZ/A/W/	4	10.32	Y B GKGK	ST 960607 QTVWEQ
0112 LIMBOG 960703 COREY/S/W/E	4	10.32	Y B GKGK	ST 960612 QMVILS
0112 LIMCCS 960710 COREY/S/W/E	4	10.32	Y B GKGK	ST 960612 QMVILS
0112 LIMBOG 960703 CROIX/A/S/D	4	10.32	Y B GKGK	ST 960607 QTYYTH
0112 LIMCCS 960710 CROIX/A/S/D	4	10.32	Y B GKGK	ST 960607 QTYYTH
0112 LIMBOG 960703 CRUZ/A/S/D/	4	10.32	Y B GKGK	ST 960610 QYPVMA
0112 LIMCCS 960710 CRUZ/A/S/D/	4	10.32	Y B GKGK	ST 960610 QYPVMA
0112 LIMBOG 960703 DAMASCUS/W/	4	10.32	Y B GKGK	ST 960610 QLCVOE
0112 LIMCCS 960710 DAMASCUS/W/	4	10.32	Y B GKGK	ST 960610 QLCVOE
0112 LIMBOG 960703 DILLARD/C/C	4	10.32	Y B GKGK	ST 960610 QYODHF
0112 LIMCCS 960710 DILLARD/C/C	4	10.32	Y B GKGK	ST 960610 QYODHF
0112 LIMBOG 960703 DORADO/E/W/	4	10.32	Y B GKGK	ST 960607 QTLXXN
0112 LIMCCS 960710 DORADO/E/W/	4	10.32	Y B GKGK	ST 960607 QTLXXN
0112 LIMBOG 960703 DREAMS/D/F/	4	10.32	Y B GKGK	ST 960612 QJIMSG
0112 LIMCCS 960710 DREAMS/D/F/	4	10.32	Y B GKGK	ST 960612 QJIMSG
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0112 LIMBOG 960703 ECH/T/Y/U/I	4	10.32	Y B GRGX	ST 960612 QJHVPK
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0112 LIMBOG 960703 EERDMANN/C/	4	10.32	Y B GKGK	ST 960610 QYPHDJ
0112 LIMCCS 960710 EERDMANN/C/	4	10.32	Y B GKGK	ST 960610 QYPHDJ
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0112 LIMCCS 960710 FERGUSON/C/	4	10.32	Y B GKGK	ST 960612 RSQPAE
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0112 LIMCCS 960710 FISH/C/V/B/	4	10.32	Y B GKGK	ST 960607 CTXADD
0112 LIMBOG 960703 FORD/A/S/D/	4	10.32	Y B GKGK	ST 960607 QTMDNU
0112 LIMCCS 960710 FORD/A/S/D/	4	10.32	Y B GKGK	ST 960607 QTMDNU
0112 LIMBOG 960703 FUERTES/C/F	4	10.32	Y B GKGK	ST 960607 QTJQAM
0112 LIMCCS 960710 FUERTES/C/F	4	10.32	Y B GKGK	ST 960607 QTJQAM
0112 LIMBOG 960703 GAITLIN/A/S	4	10.32	Y B GKGK	ST 960607 QTYCSV
0112 LIMCCS 960710 GAITLIN/A/S	4	10.32	Y B GKGK	ST 960607 QTYCSV
0112 LIMBOG 960703 GARCIA/D/F/	4	10.32	Y B GKGK	ST 960607 QTUFVP
0112 LIMCCS 960710 GARCIA/D/F/	4	10.32	Y B GKGK	ST 960607 QTUFVP
0112 LIMBOG 960703 GOATS/W/E/P	4	10.32	Y B GKGK	ST 960607 QTIOCP
0112 LIMCCS 960710 GOATS/W/E/P	4	10.32	Y B GKGK	ST 960607 QTIOCP
0112 LIMBOG 960703 GOLD/S/A/S/	4	10.32	Y B GKGK	ST 960607 QTMUQQ
0112 LIMCCS 960710 GOLD/S/A/S/	4	10.32	Y B GKGK	ST 960607 QTMUQQ
0112 LIMBOG 960703 GOLDSTEIN/C	4	10.32	Y B GKGK	ST 960607 QTWMFX
0112 LIMCCS 960710 GOLDSTEIN/C	4	10.32	Y B GKGK	ST 960607 QTWMFX
0112 LIMBOG 960703 GOLIATH/D/D	4	10.32	Y B GKGK	ST 960610 QZIQBG
0112 LIMCCS 960710 GOLIATH/D/D	4	10.32	Y B GKGK	ST 960610 QZIQBG
0112 LIMBOG 960703 GONZALES/A/	4	10.32	Y B GKGK	ST 960607 QTKE TEX
0112 LIMCCS 960710 GONZALES/A/	4	10.32	Y B GKGK	ST 960607 QTKE TEX
0112 LIMBOG 960703 GONZALEZ/A/	4	10.32	Y B GKGK	ST 960607 QTVQXJ
0112 LIMCCS 960710 GONZALEZ/A/	4	10.32	Y B GKGK	ST 960607 QTVQXJ
0112 LIMBOG 960703 GOYA/X/C/V/	4	10.32	Y B GKGK	ST 960610 QZEELN
0112 LIMCCS 960710 GOYA/X/C/V/	4	10.32	Y B GKGK	ST 960610 QZEELN
0112 LIMBOG 960703 GRAVES/C/V/	4	10.32	Y B GKGK	ST 960612 QJKSDP
0112 LIMCCS 960710 GRAVES/C/V/	4	10.32	Y B GKGK	ST 960612 QJKSDP
0112 LIMBOG 960703 GREAN/C/D/E	4	10.32	Y B GKGK	ST 960607 QJXYCI
0112 LIMCCS 960710 GREAN/C/D/E	4	10.32	Y B GKGK	ST 960607 QJXYCI
0112 LIMBOG 960703 GREANE/D/H/	4	10.32	Y B GKGK	ST 960607 QTTYUM
0112 LIMCCS 960710 GREANE/D/H/	4	10.32	Y B GKGK	ST 960607 QTTYUM
0112 LIMBOG 960703 GREEANE/W/W	4	10.32	Y B GKGK	ST 960619 SSJWUZ
0112 LIMCCS 960710 GREEANE/W/W	4	10.32	Y B GKGK	ST 960619 SSJWUZ
0112 LIMBOG 960703 GREEN/A/A/A	4	10.32	Y B GKGK	ST 960621 TQWWSV
0112 LIMCCS 960710 GREEN/A/A/A	4	10.32	Y B GKGK	ST 960621 TQWWSV
0112 LIMBOG 960703 GREEN/B/B/B	4	10.32	Y B GKGK	ST 960621 TQWYEP
0112 LIMCCS 960710 GREEN/B/B/B	4	10.32	Y B GKGK	ST 960621 TQWYEP
0112 LIMBOG 960703 GREEN/C/C/C	4	10.32	Y B GKGK	ST 960621 TQWALR

0112 LIMCCS 960710 GREEN/C/C/C	4	10.32	Y	B	GKGK	ST	960621	TQWALR
0112 LIMBOG 960703 GREEN/C/W/I	4	10.32	Y	B	GKGK	ST	960607	QTIAUG
0112 LIMCCS 960710 GREEN/C/W/I	4	10.32	Y	B	GKGK	ST	960607	QTIAUG
0112 LIMBOG 960703 GREEN/D/D/D	4	10.32	Y	B	GKGK	ST	960621	TQWDXI
0112 LIMCCS 960710 GREEN/D/D/D	4	10.32	Y	B	GKGK	ST	960621	TQWDXI
0112 LIMBOG 960703 GREEN/E/E/E	4	10.32	Y	B	GKGK	ST	960621	TQWFHG
0112 LIMCCS 960710 GREEN/E/E/E	4	10.32	Y	B	GKGK	ST	960621	TQWFHG
0112 LIMBOG 960703 GREEN/F/F/F	4	10.32	Y	B	GKGK	ST	960621	TQWJUX
0112 LIMCCS 960710 GREEN/F/F/F	4	10.32	Y	B	GKGK	ST	960621	TQWJUX
0112 LIMBOG 960703 GREEN/G/G/G	4	10.32	Y	B	GKGK	ST	960621	TQWLOH
0112 LIMCCS 960710 GREEN/G/G/G	4	10.32	Y	B	GKGK	ST	960621	TQWLOH
0112 LIMBOG 960703 GREEN/H/H/H	4	10.32	Y	B	GKGK	ST	960621	TQWOSP
0112 LIMCCS 960710 GREEN/H/H/H	4	10.32	Y	B	GKGK	ST	960621	TQWOSP
0112 LIMBOG 960703 GREEN/I/I/I	4	10.32	Y	B	GKGK	ST	960621	TQXREV
0112 LIMCCS 960710 GREEN/I/I/I	4	10.32	Y	B	GKGK	ST	960621	TQXREV
0112 LIMBOG 960703 GREEN/J/J/J	4	10.32	Y	B	GKGK	ST	960621	TQXUPC
0112 LIMCCS 960710 GREEN/J/J/J	4	10.32	Y	B	GKGK	ST	960621	TQXUPC
0112 LIMBOG 960703 GREEN/K/K/K	4	10.32	Y	B	GKGK	ST	960621	TQXXOO
0112 LIMCCS 960710 GREEN/K/K/K	4	10.32	Y	B	GKGK	ST	960621	TQXXOO
0112 LIMBOG 960703 GREEN/L/L/L	4	10.32	Y	B	GKGK	ST	960621	TQXALL
0112 LIMCCS 960710 GREEN/L/L/L	4	10.32	Y	B	GKGK	ST	960621	TQXALL
0112 LIMBOG 960703 GREEN/M/M/M	4	10.32	Y	B	GKGK	ST	960621	TQXDKR
0112 LIMCCS 960710 GREEN/M/M/M	4	10.32	Y	B	GKGK	ST	960621	TQXDKR
0112 LIMBOG 960703 GREEN/N/N/N	4	10.32	Y	B	GKGK	ST	960621	TQXGIU
0112 LIMCCS 960710 GREEN/N/N/N	4	10.32	Y	B	GKGK	ST	960621	TQXGIU
0112 LIMBOG 960703 GREEN/O/O/O	4	10.32	Y	B	GKGK	ST	960621	TQXKVN
0112 LIMCCS 960710 GREEN/O/O/O	4	10.32	Y	B	GKGK	ST	960621	TQXKVN
0112 LIMBOG 960703 GREEN/P/P/P	4	10.32	Y	B	GKGK	ST	960621	TQXMJB
0112 LIMCCS 960710 GREEN/P/P/P	4	10.32	Y	B	GKGK	ST	960621	TQXMJB
0112 LIMBOG 960703 GREEN/Q/Q/Q	4	10.32	Y	B	GKGK	ST	960621	TQXPVA
0112 LIMCCS 960710 GREEN/Q/Q/Q	4	10.32	Y	B	GKGK	ST	960621	TQXPVA
0112 LIMBOG 960703 GREEN/R/R/R	4	10.32	Y	B	GKGK	ST	960621	TQYSSP
0112 LIMCCS 960710 GREEN/R/R/R	4	10.32	Y	B	GKGK	ST	960621	TQYSSP
0112 LIMBOG 960703 GREEN/S/S/S	4	10.32	Y	B	GKGK	ST	960621	TQYUJK
0112 LIMCCS 960710 GREEN/S/S/S	4	10.32	Y	B	GKGK	ST	960621	TQYUJK
0112 LIMBOG 960703 GREEN/T/T/T	4	10.32	Y	B	GKGK	ST	960621	TQYXBB
0112 LIMCCS 960710 GREEN/T/T/T	4	10.32	Y	B	GKGK	ST	960621	TQYXBB
0112 LIMBOG 960703 GREEN/U/U/U	4	10.32	Y	B	GKGK	ST	960621	TQYBET
0112 LIMCCS 960710 GREEN/U/U/U	4	10.32	Y	B	GKGK	ST	960621	TQYBET
0112 LIMBOG 960703 GREEN/V/V/V	4	10.32	Y	B	GKGK	ST	960621	TQYIDA
0112 LIMCCS 960710 GREEN/V/V/V	4	10.32	Y	B	GKGK	ST	960621	TQYIDA
0112 LIMBOG 960703 GREEN/W/W/W	4	10.32	Y	B	GKGK	ST	960621	TQYLUB
0112 LIMCCS 960710 GREEN/W/W/W	4	10.32	Y	B	GKGK	ST	960621	TQYLUB
0112 LIMBOG 960703 GREEN/X/X/X	4	10.32	Y	B	GKGK	ST	960621	TQYNIR
0112 LIMCCS 960710 GREEN/X/X/X	4	10.32	Y	B	GKGK	ST	960621	TQYNIR
0112 LIMBOG 960703 GREEN/Y/Y/Y	4	10.32	Y	B	GKGK	ST	960621	TQZQVI
0112 LIMCCS 960710 GREEN/Y/Y/Y	4	10.32	Y	B	GKGK	ST	960621	TQZQVI
0112 LIMBOG 960703 GREEN/Z/Z/Z	4	10.32	Y	B	GKGK	ST	960621	TQZSCG
0112 LIMCCS 960710 GREEN/Z/Z/Z	4	10.32	Y	B	GKGK	ST	960621	TQZSCG
0112 LIMBOG 960703 GREENE/C/D/	4	10.32	Y	B	GKGK	ST	960607	QTVOE
0112 LIMCCS 960710 GREENE/C/D/	4	10.32	Y	B	GKGK	ST	960607	QTVOE
0112 LIMBOG 960703 GREENLEY/C/	4	10.32	Y	B	GKGK	ST	960610	QLBKYS
0112 LIMCCS 960710 GREENLEY/C/	4	10.32	Y	B	GKGK	ST	960610	QLBKYS
0112 LIMBOG 960703 HAYDDEN/H/R	4	10.32	Y	B	GKGK	ST	960619	SSKQUA
0112 LIMCCS 960710 HAYDDEN/H/H	4	10.32	Y	B	GKGK	ST	960619	SSKQUA
0112 LIMBOG 960703 HAYDEN/M/D/	4	10.32	Y	B	GKGK	ST	960607	QSNNGI
0112 LIMCCS 960710 HAYDEN/M/D/	4	10.32	Y	B	GKGK	ST	960607	QSNNGI
0112 LIMBOG 960703 HAYDENN/S/S	4	10.32	Y	B	GKGK	ST	960619	SSKSIJ
0112 LIMCCS 960710 HAYDENN/S/S	4	10.32	Y	B	GKGK	ST	960619	SSKSIJ
0112 LIMBOG 960703 HAYYDDENN/D	4	10.32	Y	B	GKGK	ST	960619	SSJJYN
0112 LIMCCS 960710 HAYYDDENN/D	4	10.32	Y	B	GKGK	ST	960619	SSJJYN
0112 LIMBOG 960703 HAYYDEN/M/M	4	10.32	Y	B	GKGK	ST	960619	SSJMEI
0112 LIMCCS 960710 HAYYDEN/M/M	4	10.32	Y	B	GKGK	ST	960619	SSJMEI
0112 LIMBOG 960703 HERCULES/C/	4	10.32	Y	B	GKGK	ST	960610	QLCKVU
0112 LIMCCS 960710 HERCULES/C/	4	10.32	Y	B	GKGK	ST	960610	QLCKVU
0112 LIMBOG 960703 HERNANDEZ/A	4	10.32	Y	B	GKGK	ST	960607	QTKDXX
0112 LIMCCS 960710 HERNANDEZ/A	4	10.32	Y	B	GKGK	ST	960607	QTKDXX
0112 LIMBOG 960703 HILERA/H/J/	4	10.32	Y	B	GKGK	ST	960607	QTVZQT
0112 LIMCCS 960710 HILERA/H/J/	4	10.32	Y	B	GKGK	ST	960607	QTVZQT
0112 LIMBOG 960703 HORSES/C/V/	4	10.32	Y	B	GKGK	ST	960607	QTISQP
0112 LIMCCS 960710 HORSES/C/V/	4	10.32	Y	B	GKGK	ST	960607	QTISQP
0112 LIMBOG 960703 ICK/Y/U/I/O	4	10.32	Y	B	GKGK	ST	960612	QMVOAA
0112 LIMCCS 960710 ICK/Y/U/I/O	4	10.32	Y	B	GKGK	ST	960612	QMVOAA

0112 LIMBOG 960703 JIMENEZ/A/E	4	10.32	Y B GKKG	ST 960607 QTTMUR
0112 LIMCCS 960710 JIMENEZ/A/E	4	10.32	Y B GKKG	ST 960607 QTTMUR
0112 LIMBOG 960703 JONES/A/Q/A	4	10.32	Y B GKKG	ST 960619 SSILBV
0112 LIMCCS 960710 JONES/A/Q/A	4	10.32	Y B GKKG	ST 960619 SSILBV
0112 LIMBOG 960703 JOONES/C/V/	4	10.32	Y B GKKG	ST 960619 SSINTH
0112 LIMCCS 960710 JOONES/C/V/	4	10.32	Y B GKKG	ST 960619 SSINTH
0112 LIMBOG 960703 KUSHNER/V/	4	10.32	Y B GKKG	ST 960619 SSKBBL
0112 LIMCCS 960710 KUSHNER/V/	4	10.32	Y B GKKG	ST 960619 SSKBBL
0112 LIMBOG 960703 KUUSHNER/C/	4	10.32	Y B GKKG	ST 960619 SSKGDN
0112 LIMCCS 960710 KUUSHNER/C/	4	10.32	Y B GKKG	ST 960619 SSKGDN
0112 LIMBOG 960703 LAMBERSON/C	4	10.32	Y B GKKG	ST 960610 QYNLJT
0112 LIMCCS 960710 LAMBERSON/C	4	10.32	Y B GKKG	ST 960610 QYNLJT
0112 LIMBOG 960703 LAMPBERT/Q/	4	10.32	Y B GKKG	ST 960610 QLBPLA
0112 LIMCCS 960710 LAMPBERT/Q/	4	10.32	Y B GKKG	ST 960610 QLBPLA
0112 LIMBOG 960703 LEE/A/A/A/A	4	10.32	Y B GKKG	ST 960621 TQZXPC
0112 LIMCCS 960710 LEE/A/A/A/A	4	10.32	Y B GKKG	ST 960621 TQZXPC
0112 LIMBOG 960703 LEE/B/B/B/B	4	10.32	Y B GKKG	ST 960621 TQZAGF
0112 LIMCCS 960710 LEE/B/B/B/B	4	10.32	Y B GKKG	ST 960621 TQZAGF
0112 LIMBOG 960703 LEE/C/C/C/C	4	10.32	Y B GKKG	ST 960621 TQZCNK
0112 LIMCCS 960710 LEE/C/C/C/C	4	10.32	Y B GKKG	ST 960621 TQZCNK
0112 LIMBOG 960703 LEE/C/V/B/N	4	10.32	Y B GKKG	ST 960607 QTCMRL
0112 LIMCCS 960710 LEE/C/V/B/N	4	10.32	Y B GKKG	ST 960607 QTCMRL
0112 LIMBOG 960703 LEE/D/D/D/D	4	10.32	Y B GKKG	ST 960621 TQZFVS
0112 LIMCCS 960710 LEE/D/D/D/D	4	10.32	Y B GKKG	ST 960621 TQZFVS
0112 LIMBOG 960703 LEE/E/E/E/E	4	10.32	Y B GKKG	ST 960621 TQZHJE
0112 LIMCCS 960710 LEE/E/E/E/E	4	10.32	Y B GKKG	ST 960621 TQZHJE
0112 LIMBOG 960703 LEE/F/F/F/F	4	10.32	Y B GKKG	ST 960621 TQZKVQ
0112 LIMCCS 960710 LEE/F/F/F/F	4	10.32	Y B GKKG	ST 960621 TQZKVQ
0112 LIMBOG 960703 LEE/G/G/G/G	4	10.32	Y B GKKG	ST 960621 TQZNKR
0112 LIMCCS 960710 LEE/G/G/G/G	4	10.32	Y B GKKG	ST 960621 TQZNKR
0112 LIMBOG 960703 LEE/H/H/H/H	4	10.32	Y B GKKG	ST 960621 TQAQEF
0112 LIMCCS 960710 LEE/H/H/H/H	4	10.32	Y B GKKG	ST 960621 TQAQEF
0112 LIMBOG 960703 LEE/I/I/I/I	4	10.32	Y B GKKG	ST 960621 TQASPU
0112 LIMCCS 960710 LEE/I/I/I/I	4	10.32	Y B GKKG	ST 960621 TQASPU
0112 LIMBOG 960703 LEE/J/J/J/J	4	10.32	Y B GKKG	ST 960621 TQAVHE
0112 LIMCCS 960710 LEE/J/J/J/J	4	10.32	Y B GKKG	ST 960621 TQAVHE
0112 LIMBOG 960703 LEE/K/K/K/K	4	10.32	Y B GKKG	ST 960621 TQABIW
0112 LIMCCS 960710 LEE/K/K/K/K	4	10.32	Y B GKKG	ST 960621 TQABIW
0112 LIMBOG 960703 LEE/L/L/L/L	4	10.32	Y B GKKG	ST 960621 TQAESZ
0112 LIMCCS 960710 LEE/L/L/L/L	4	10.32	Y B GKKG	ST 960621 TQAESZ
0112 LIMBOG 960703 LEE/M/M/M/M	4	10.32	Y B GKKG	ST 960621 TQAKZF
0112 LIMCCS 960710 LEE/M/M/M/M	4	10.32	Y B GKKG	ST 960621 TQAKZF
0112 LIMBOG 960703 LEE/N/N/N/N	4	10.32	Y B GKKG	ST 960621 TQAMFZ
0112 LIMCCS 960710 LEE/N/N/N/N	4	10.32	Y B GKKG	ST 960621 TQAMFZ
0112 LIMBOG 960703 LEE/O/O/O/O	4	10.32	Y B GKKG	ST 960621 TQAPFN
0112 LIMCCS 960710 LEE/O/O/O/O	4	10.32	Y B GKKG	ST 960621 TQAPFN
0112 LIMBOG 960703 LEE/P/P/P/P	4	10.32	Y B GKKG	ST 960621 TQBSXC
0112 LIMCCS 960710 LEE/P/P/P/P	4	10.32	Y B GKKG	ST 960621 TQBSXC
0112 LIMBOG 960703 LEE/Q/Q/Q/Q	4	10.32	Y B GKKG	ST 960621 TQBWSX
0112 LIMCCS 960710 LEE/Q/Q/Q/Q	4	10.32	Y B GKKG	ST 960621 TQBWSX
0112 LIMBOG 960703 LEE/R/R/R/R	4	10.32	Y B GKKG	ST 960621 TQBYJQ
0112 LIMCCS 960710 LEE/R/R/R/R	4	10.32	Y B GKKG	ST 960621 TQBYJQ
0112 LIMBOG 960703 LEE/S/S/S/S	4	10.32	Y B GKKG	ST 960621 TQJGRK
0112 LIMCCS 960710 LEE/S/S/S/S	4	10.32	Y B GKKG	ST 960621 TQJGRK
0112 LIMBOG 960703 LEE/T/T/T/T	4	10.32	Y B GKKG	ST 960621 TQKGYQ
0112 LIMCCS 960710 LEE/T/T/T/T	4	10.32	Y B GKKG	ST 960621 TQKGYQ
0112 LIMBOG 960703 LENTZ/A/W/E	4	10.32	Y B GKKG	ST 960612 QMWNWQ
0112 LIMCCS 960710 LENTZ/A/W/E	4	10.32	Y B GKKG	ST 960612 QMWNWQ
0112 LIMBOG 960703 LEVINE/A/S/	4	10.32	Y B GKKG	ST 960607 QTMYLO
0112 LIMCCS 960710 LEVINE/A/S/	4	10.32	Y B GKKG	ST 960607 QTMYLO
0112 LIMBOG 960703 LOCH/T/Y/U/	4	10.32	Y B GKKG	ST 960612 QMWTCA
0112 LIMCCS 960710 LOCH/T/Y/U/	4	10.32	Y B GKKG	ST 960612 QMWTCA
0112 LIMBOG 960703 LOMBA/Z/X/C	4	10.32	Y B GKKG	ST 960607 QTKLPN
0112 LIMCCS 960710 LOMBA/Z/X/C	4	10.32	Y B GKKG	ST 960607 QTKLPN
0112 LIMBOG 960703 LOMLINSON/C	4	10.32	Y B GKKG	ST 960610 QZGUIG
0112 LIMCCS 960710 LOMLINSON/C	4	10.32	Y B GKKG	ST 960610 QZGUIG
0112 LIMBOG 960703 LONG/S/S/S/	4	10.32	Y B GKKG	ST 960619 SSKIYL
0112 LIMCCS 960710 LONG/S/S/S/	4	10.32	Y B GKKG	ST 960619 SSKIYL
0112 LIMBOG 960703 MAGOO/P/P/P	4	10.32	Y B GKKG	ST 960610 QYPBEW
0112 LIMCCS 960710 MAGOO/P/P/P	4	10.32	Y B GKKG	ST 960610 QYPBEW
0112 LIMBOG 960703 MALHUMORS/C	4	10.32	Y B GKKG	ST 960612 QJIPQY
0112 LIMCCS 960710 MALHUMORS/C	4	10.32	Y B GKKG	ST 960612 QJIPQY
0112 LIMBOG 960703 MANERA/V/B/	4	10.32	Y B GKKG	ST 960612 QJJPCU

0112 LIMCCS 960710 MANERA/V/B/	4	10.32	Y B GKGK	ST 960612 QJJPCU
0112 LIMBOG 960703 MAPLE/S/W/E	4	10.32	Y B GKGK	ST 960607 QTUAAU
0112 LIMCCS 960710 MAPLE/S/W/E	4	10.32	Y B GKGK	ST 960607 QTUAAU
0112 LIMBOG 960703 MARCUS/C/V/	4	10.32	Y B GKGK	ST 960607 QTNHYD
0112 LIMCCS 960710 MARCUS/C/V/	4	10.32	Y B GKGK	ST 960607 QTNHYD
0112 LIMBOG 960703 MARIE/C/V/F	4	10.32	Y B GKGK	ST 960619 SSJTEZ
0112 LIMCCS 960710 MARIE/C/V/F	4	10.32	Y B GKGK	ST 960619 SSJTEZ
0112 LIMBOG 960703 MARTINEZ/A/	4	10.32	Y B GKGK	ST 960607 QTKAUS
0112 LIMCCS 960710 MARTINEZ/A/	4	10.32	Y B GKGK	ST 960607 QTKAUS
0112 LIMBOG 960703 MARULLO/A/W	4	10.32	Y B GKGK	ST 960610 QYPCDC
0112 LIMCCS 960710 MARULLO/A/W	4	10.32	Y B GKGK	ST 960610 QYPCDC
0112 LIMBOG 960703 MAXIM/X/S/E	4	10.32	Y B GKGK	ST 960607 QTYASN
0112 LIMCCS 960710 MAXIM/X/S/E	4	10.32	Y B GKGK	ST 960607 QTYASN
0112 LIMBOG 960703 MAYAGUEZ/C/	4	10.32	Y B GKGK	ST 960612 QJJAKK
0112 LIMCCS 960710 MAYAGUEZ/C/	4	10.32	Y B GKGK	ST 960612 QJJAKK
0112 LIMBOG 960703 MCCONNELL/C	4	10.32	Y B GKGK	ST 960607 QTWUHO
0112 LIMCCS 960710 MCCONNELL/C	4	10.32	Y B GKGK	ST 960607 QTWUHO
0112 LIMBOG 960703 MEDICOS/A/W	4	10.32	Y B GKGK	ST 960607 QTWFNL
0112 LIMCCS 960710 MEDICOS/A/W	4	10.32	Y B GKGK	ST 960607 QTWFNL
0112 LIMBOG 960703 MELOCOTON/S	4	10.32	Y B GKGK	ST 960610 QZENFJ
0112 LIMCCS 960710 MELOCOTON/S	4	10.32	Y B GKGK	ST 960610 QZENFJ
0112 LIMBOG 960703 MILLER/S/S/	4	10.32	Y B GKGK	ST 960610 QLCARE
0112 LIMCCS 960710 MILLER/S/S/	4	10.32	Y B GKGK	ST 960610 QLCARE
0112 LIMBOG 960703 MITCHELL/S/	4	10.32	Y B GKGK	ST 960607 QTUJTY
0112 LIMCCS 960710 MITCHELL/S/	4	10.32	Y B GKGK	ST 960607 QTUJTY
0112 LIMBOG 960703 MOHAMMED/C/	4	10.32	Y B GKGK	ST 960610 QZGBFT
0112 LIMCCS 960710 MOHAMMED/C/	4	10.32	Y B GKGK	ST 960610 QZGBFT
0112 LIMBOG 960703 MOOREE/S/S/	4	10.32	Y B GKGK	ST 960619 SSKWHV
0112 LIMCCS 960710 MOOREE/S/S/	4	10.32	Y B GKGK	ST 960619 SSKWHV
0112 LIMBOG 960703 MOORES/C/V/	4	10.32	Y B GKGK	ST 960607 QJYPVK
0112 LIMCCS 960710 MOORES/C/V/	4	10.32	Y B GKGK	ST 960607 QJYPVK
0112 LIMBOG 960703 MORRE/C/C/C	4	10.32	Y B GKGK	ST 960619 SSKYHD
0112 LIMCCS 960710 MORRE/C/C/C	4	10.32	Y B GKGK	ST 960619 SSKYHD
0112 LIMBOG 960703 MOSHIER/C/C	4	10.32	Y B GKGK	ST 960610 QZILEP
0112 LIMCCS 960710 MOSHIER/C/C	4	10.32	Y B GKGK	ST 960610 QZILEP
0112 LIMBOG 960703 NAIM/C/V/F/	4	10.32	Y B GKGK	ST 960612 QJJKEJ
0112 LIMCCS 960710 NAIM/C/V/F/	4	10.32	Y B GKGK	ST 960612 QJJKEJ
0112 LIMBOG 960703 NAVAS/C/V/B	4	10.32	Y B GKGK	ST 960612 QMYVLS
0112 LIMCCS 960710 NAVAS/C/V/B	4	10.32	Y B GKGK	ST 960612 QMYVLS
0112 LIMBOG 960703 NEWES/X/C/V	4	10.32	Y B GKGK	ST 960612 QMKEZX
0112 LIMCCS 960710 NEWES/X/C/V	4	10.32	Y B GKGK	ST 960612 QMKEZX
0112 LIMBOG 960703 OAK/S/W/Q/R	4	10.32	Y B GKGK	ST 960607 QTJHSX
0112 LIMCCS 960710 OAK/S/W/Q/R	4	10.32	Y B GKGK	ST 960607 QTJHSX
0112 LIMBOG 960703 OCH/M/K/L/P	4	10.32	Y B GKGK	ST 960612 QJHXHN
0112 LIMCCS 960710 OCH/M/K/L/P	4	10.32	Y B GKGK	ST 960612 QJHXHN
0112 LIMBOG 960703 PALM/V/B/N	4	10.32	Y B GKGK	ST 960607 QTNAIN
0112 LIMCCS 960710 PALM/V/B/N	4	10.32	Y B GKGK	ST 960607 QTNAIN
0112 LIMBOG 960703 PALMER/V/B/	4	10.32	Y B GKGK	ST 960612 RSRVPK
0112 LIMCCS 960710 PALMER/V/B/	4	10.32	Y B GKGK	ST 960612 RSRVPK
0112 LIMBOG 960703 PARKS/C/V/B	4	10.32	Y B GKGK	ST 960612 QJHILW
0112 LIMCCS 960710 PARKS/C/V/B	4	10.32	Y B GKGK	ST 960612 QJHILW
0112 LIMBOG 960703 PENA/Q/W/O/	4	10.32	Y B GKGK	ST 960612 QMZTWI
0112 LIMCCS 960710 PENA/Q/W/O/	4	10.32	Y B GKGK	ST 960612 QMZTWI
0112 LIMBOG 960703 PENNER/A/S/	4	10.32	Y B GKGK	ST 960607 QTMWGB
0112 LIMCCS 960710 PENNER/A/S/	4	10.32	Y B GKGK	ST 960607 QTMWGB
0112 LIMBOG 960703 PEPO/S/D/F/	4	10.32	Y B GKGK	ST 960607 QTLPEM
0112 LIMCCS 960710 PEPO/S/D/F/	4	10.32	Y B GKGK	ST 960607 QTLPEM
0112 LIMBOG 960703 PEREZ/A/W/E	4	10.32	Y B GKGK	ST 960607 QTUMUP
0112 LIMCCS 960710 PEREZ/A/W/E	4	10.32	Y B GKGK	ST 960607 QTUMUP
0112 LIMBOG 960703 PINNES/C/V/	4	10.32	Y B GKGK	ST 960607 QTLGUT
0112 LIMCCS 960710 PINNES/C/V/	4	10.32	Y B GKGK	ST 960607 QTLGUT
0112 LIMBOG 960703 PINO/R/T/X/	4	10.32	Y B GKGK	ST 960610 QYNCPI
0112 LIMCCS 960710 PINO/R/T/X/	4	10.32	Y B GKGK	ST 960610 QYNCPI
0112 LIMBOG 960703 PIPERS/C/V/	4	10.32	Y B GKGK	ST 960607 QTXXKAX
0112 LIMCCS 960710 PIPERS/C/V/	4	10.32	Y B GKGK	ST 960607 QTXXKAX
0112 LIMBOG 960703 PLAYERO/C/V	4	10.32	Y B GKGK	ST 960607 QTGAN
0112 LIMCCS 960710 PLAYERO/C/V	4	10.32	Y B GKGK	ST 960607 QTGAN
0112 LIMBOG 960703 PONCE/S/D/F	4	10.32	Y B GKGK	ST 960607 QTNPNU
0112 LIMCCS 960710 PONCE/S/D/F	4	10.32	Y B GKGK	ST 960607 QTNPNU
0112 LIMBOG 960703 PONIES/C/V/	4	10.32	Y B GKGK	ST 960607 QTSNZU
0112 LIMCCS 960710 PONIES/C/V/	4	10.32	Y B GKGK	ST 960607 QTSNZU
0112 LIMBOG 960703 RADCLIFFE/S/	4	10.32	Y B GKGK	ST 960607 QTUYZH
0112 LIMCCS 960710 RADCLIFFE/S/	4	10.32	Y B GKGK	ST 960607 QTUYZH

0112 LIMCCS 960710 SHEPARD/C/C	4	10.32	Y	B	GKGK	ST	960610	QZGKBQ
0112 LIMBOG 960703 SHORT/S/S/S	4	10.32	Y	B	GKGK	ST	960619	SSKKOH
0112 LIMCCS 960710 SHORT/S/S/S	4	10.32	Y	B	GKGK	ST	960619	SSKKOH
0112 LIMBOG 960703 SHUSTER/X/C	4	10.32	Y	B	GKGK	ST	960610	QZHGDJ
0112 LIMCCS 960710 SHUSTER/X/C	4	10.32	Y	B	GKGK	ST	960610	QZHGDJ
0112 LIMBOG 960703 SHWEKI/A/A/	4	10.32	Y	B	GKGK	ST	960610	QLCTPX
0112 LIMCCS 960710 SHWEKI/A/A/	4	10.32	Y	B	GKGK	ST	960610	QLCTPX
0112 LIMBOG 960703 SILVER/S/D/	4	10.32	Y	B	GKGK	ST	960607	QTWJLC
0112 LIMCCS 960710 SILVER/S/D/	4	10.32	Y	B	GKGK	ST	960607	QTWJLC
0112 LIMBOG 960703 SMITH/I/O/P	4	10.32	Y	B	GKGK	ST	960619	SSIISZ
0112 LIMCCS 960710 SMITH/I/O/P	4	10.32	Y	B	GKGK	ST	960619	SSIISZ
0112 LIMBOG 960703 SMITH/Q/W/E	4	10.32	Y	B	GKGK	ST	960607	QTQNQZ
0112 LIMCCS 960710 SMITH/Q/W/E	4	10.32	Y	B	GKGK	ST	960607	QTQNQZ
0112 LIMBOG 960703 SMITHE/A/S/	4	10.32	Y	B	GKGK	ST	960610	QYOHKK
0112 LIMCCS 960710 SMITHE/A/S/	4	10.32	Y	B	GKGK	ST	960610	QYOHKK
0112 LIMBOG 960703 SMITHH/N/M/	4	10.32	Y	B	GKGK	ST	960612	QJKZYH
0112 LIMCCS 960710 SMITHH/N/M/	4	10.32	Y	B	GKGK	ST	960612	QJKZYH
0112 LIMBOG 960703 SOTO/C/D/E/	4	10.32	Y	B	GKGK	ST	960607	QTVSQD
0112 LIMCCS 960710 SOTO/C/D/E/	4	10.32	Y	B	GKGK	ST	960607	QTVSQD
0112 LIMBOG 960703 SPROLL/W/W/	4	10.32	Y	B	GKGK	ST	960612	QMWCKG
0112 LIMCCS 960710 SPROLL/W/W/	4	10.32	Y	B	GKGK	ST	960612	QMWCKG
0112 LIMBOG 960703 SUENOS/C/V/	4	10.32	Y	B	GKGK	ST	960612	QJINEP
0112 LIMCCS 960710 SUENOS/C/V/	4	10.32	Y	B	GKGK	ST	960612	QJINEP
0112 LIMBOG 960703 SURFERS/X/C	4	10.32	Y	B	GKGK	ST	960607	QTXEIM
0112 LIMCCS 960710 SURFERS/X/C	4	10.32	Y	B	GKGK	ST	960607	QTXEIM
0112 LIMBOG 960703 SYRIA/C/V/F	4	10.32	Y	B	GKGK	ST	960610	QYOVEF
0112 LIMCCS 960710 SYRIA/C/V/F	4	10.32	Y	B	GKGK	ST	960610	QYOVEF
0112 LIMBOG 960703 TAILOR/C/V/	4	10.32	Y	B	GKGK	ST	960619	SSIWSY
0112 LIMCCS 960710 TAILOR/C/V/	4	10.32	Y	B	GKGK	ST	960619	SSIWSY
0112 LIMBOG 960703 THOMAS/C/V/	4	10.32	Y	B	GKGK	ST	960607	QTYRHW
0112 LIMCCS 960710 THOMAS/C/V/	4	10.32	Y	B	GKGK	ST	960607	QTYRHW
0112 LIMBOG 960703 TIP/W/E/R/T	4	10.32	Y	B	GKGK	ST	960612	QMWNQ
0112 LIMCCS 960710 TIP/W/E/R/T	4	10.32	Y	B	GKGK	ST	960612	QMWNQ
0112 LIMBOG 960703 TITANS/C/V/	4	10.32	Y	B	GKGK	ST	960610	QZHIPP
0112 LIMCCS 960710 TITANS/C/V/	4	10.32	Y	B	GKGK	ST	960610	QZHIPP
0112 LIMBOG 960703 TOPPS/C/V/T	4	10.32	Y	B	GKGK	ST	960612	QMVKGZ
0112 LIMCCS 960710 TOPPS/C/V/T	4	10.32	Y	B	GKGK	ST	960612	QMVKGZ
0112 LIMBOG 960703 TORO/C/V/B/	4	10.32	Y	B	GKGK	ST	960607	QTKGMI
0112 LIMCCS 960710 TORO/C/V/B/	4	10.32	Y	B	GKGK	ST	960607	QTKGMI
0112 LIMBOG 960703 TORRES/L/L/	4	10.32	Y	B	GKGK	ST	960612	QMYKEN
0112 LIMCCS 960710 TORRES/L/L/	4	10.32	Y	B	GKGK	ST	960612	QMYKEN
0112 LIMBOG 960703 TREBOL/A/S/	4	10.32	Y	B	GKGK	ST	960607	QTVMYI
0112 LIMCCS 960710 TREBOL/A/S/	4	10.32	Y	B	GKGK	ST	960607	QTVMYI
0112 LIMBOG 960703 TREES/A/S/D	4	10.32	Y	B	GKGK	ST	960607	QTSJVH
0112 LIMCCS 960710 TREES/A/S/D	4	10.32	Y	B	GKGK	ST	960607	QTSJVH
0112 LIMBOG 960703 TRISTE/D/D/	4	10.32	Y	B	GKGK	ST	960612	QJKRER
0112 LIMCCS 960710 TRISTE/D/D/	4	10.32	Y	B	GKGK	ST	960612	QJKRER
0112 LIMBOG 960703 TRUJILLO/V/	4	10.32	Y	B	GKGK	ST	960612	QMYESF
0112 LIMCCS 960710 TRUJILLO/V/	4	10.32	Y	B	GKGK	ST	960612	QMYESF
0112 LIMBOG 960703 VALLECILLO/	4	10.32	Y	B	GKGK	ST	960607	QTUQNW
0112 LIMCCS 960710 VALLECILLO/	4	10.32	Y	B	GKGK	ST	960607	QTUQNW
0112 LIMBOG 960703 VDEW/A/S/D/	4	10.32	Y	B	GKGK	ST	960612	QJHSEX
0112 LIMCCS 960710 VDEW/A/S/D/	4	10.32	Y	B	GKGK	ST	960612	QJHSEX
0112 LIMBOG 960703 VINOS/A/S/W	4	10.32	Y	B	GKGK	ST	960607	QTNSPQ
0112 LIMCCS 960710 VINOS/A/S/W	4	10.32	Y	B	GKGK	ST	960607	QTNSPQ
0112 LIMBOG 960703 VITTO/S/D/F	4	10.32	Y	B	GKGK	ST	960607	QTNUIU
0112 LIMCCS 960710 VITTO/S/D/F	4	10.32	Y	B	GKGK	ST	960607	QTNUIU
0112 LIMBOG 960703 WERT/V/B/N/	4	10.32	Y	B	GKGK	ST	960612	QMWKCR
0112 LIMCCS 960710 WERT/V/B/N/	4	10.32	Y	B	GKGK	ST	960612	QMWKCR
0112 LIMBOG 960703 WHITE/S/D/G	4	10.32	Y	B	GKGK	ST	960607	QTIIIBJ
0112 LIMCCS 960710 WHITE/S/D/G	4	10.32	Y	B	GKGK	ST	960607	QTIIIBJ
0112 LIMBOG 960703 WHITING/F/G	4	10.32	Y	B	GKGK	ST	960610	QZFIBH
0112 LIMCCS 960710 WHITING/F/G	4	10.32	Y	B	GKGK	ST	960610	QZFIBH
0112 LIMBOG 960703 YUKON/D/F/G	4	10.32	Y	B	GKGK	ST	960612	QJIZZX
0112 LIMCCS 960710 YUKON/D/F/G	4	10.32	Y	B	GKGK	ST	960612	QJIZZX

TOTALS:

1960 5056.80

Sound Technologies Inc. CRSAUDIT Version 4.2 - Tue Sep 24 13:34:22 1996

SANTA AIRLINES

Sabre - Agency Summary Report

JULY 1996

US 4550188 Q4B2 DEBONIAR TRAVEL INC. # HOUSTON TX
ST Y B 124 319.92
ST Y C 4 -9.84
Totals: 128 310.08

Agency Totals: 128 310.08

Agency Status Distribution

US 4550188 Q4B2 DEBONIAR TRAVEL INC. # HOUSTON TX
GK B 124 319.92
GK C 4 -9.84
Totals: 128 310.08

Agency Totals: 128 310.08

Sound Technologies Inc. CRSAUDIT Version 4.2 - Tue Sep 24 13:34:24 1996

SAETA AIRLINES

Sabre Detail for Pseudo City Code Q4B2

JULY 1996

(US - DEBONIAR TRAVEL INC.)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	C1	stat	Acc	TrDate	Locatr
0112	LIMBOG	960806	HAYDEN/M/D/	4	10.32	Y B	GKGK	ST	960719	SHKUGR
0112	LIMBOG	960806	LEE/B/D/L/S	4	10.32	Y B	GKGK	ST	960719	SHKKFM
0112	LIMBOG	960806	SMITH/A/A/A	4	10.32	Y B	GKGK	ST	960719	SHBMKP
0112	LIMBOG	960806	SMITH/A/B/C	4	10.32	Y B	GKGK	ST	960719	SHJOHT
0112	LIMBOG	960806	SMITH/B/B/B	4	10.32	Y B	GKGK	ST	960719	SHCXRS
0112	LIMBOG	960806	SMITH/C/C/C	4	10.32	Y B	GKGK	ST	960719	SHFGIB
0112	LIMBOG	960806	SMITH/D/D/D	4	10.32	Y B	GKGK	ST	960719	SHFJKV
0112	LIMBOG	960806	SMITH/E/E/E	4	10.32	Y B	GKGK	ST	960719	SHFMPZ
0112	LIMBOG	960806	SMITH/F/F/F	4	10.32	Y B	GKGK	ST	960719	SHGQPM
0112	LIMBOG	960806	SMITH/G/G/G	4	10.32	Y B	GKGK	ST	960719	SHGTTT
0112	LIMBOG	960806	SMITH/H/H/H	4	10.32	Y B	GKGK	ST	960719	SHGVJK
0112	LIMBOG	960806	SMITH/I/I/I	4	10.32	Y B	GKGK	ST	960719	SHGZYI
0112	LIMBOG	960806	SMITH/J/J/J	4	10.32	Y B	GKGK	ST	960719	SHGCBW
0112	LIMBOG	960806	SMITH/K/K/K	4	10.32	Y B	GKGK	ST	960719	SHGFYU
0112	LIMBOG	960806	SMITH/L/L/L	4	10.32	Y B	GKGK	ST	960719	SHGHEY
0112	LIMBOG	960806	SMITH/M/M/M	4	10.32	Y B	GKGK	ST	960719	SHGKEA
0112	LIMBOG	960806	SMITH/N/N/N	4	10.32	Y B	GKGK	ST	960719	SHGNYD
0112	LIMBOG	960806	SMITH/O/O/O	4	10.32	Y B	GKGK	ST	960719	SHEXTV
0112	LIMBOG	960806	SMITH/P/P/P	4	10.32	Y B	GKGK	ST	960719	SHHZDR
0114	LIMBOG	960805	SMITH/Q/Q/Q	4	10.32	Y B	GKGK	ST	960719	SHHBHG
0112	LIMBOG	960806	SMITH/R/R/R	4	10.32	Y B	GKGK	ST	960719	SHIKSQ
0112	LIMBOG	960806	SMITH/S/S/S	4	10.32	Y B	GKGK	ST	960719	SHIMFV
0112	LIMBOG	960806	SMITH/T/T/T	4	10.32	Y B	GKGK	ST	960719	SHIOKO
0112	LIMBOG	960806	SMITH/U/U/U	4	10.32	Y B	GKGK	ST	960719	SHJSVS
0112	LIMBOG	960806	SMITH/V/V/V	4	10.32	Y B	GKGK	ST	960719	SHJWRJ
0112	LIMBOG	960806	SMITH/W/W/W	4	10.32	Y B	GKGK	ST	960719	SHJYJE
0112	LIMBOG	960806	SMITH/X/X/X	4	10.32	Y B	GKGK	ST	960719	SHJBSM
0112	LIMBOG	960806	SMITH/Y/Y/Y	4	10.32	Y B	GKGK	ST	960719	SHJDOS
0112	LIMBOG	960806	SMITH/Z/Z/Z	4	10.32	Y B	GKGK	ST	960719	SHJGYP
0112	LIMBOG	960806	STONE/C/V/B	4	10.32	Y B	GKGK	ST	960719	SHKRCJ

TOTALS: 120 309.60

REJECTIONS - UNDOCUMENTED NAMES. UNABLE TO FIND ON HOST SYSTEM.

Sound Technologies, Inc.
Comments to the Department of Transportation

Exhibit of Example of High Net Cost (Churning Agencies)

The attached example of the report captioned "High Net Cost Agencies reflects agencies who have been detected for abusive booking activity. The audit trail for detecting these agencies is the high average cost per segment.

This report shows agencies who are Churning their bookings. The agency will book and cancel the same passenger on multiple segments all on the same day. Other infractions noted are violation of the airlines 24 hour ticketing rule.

These abusive actions play havoc with an airline's inventory.

AIR JAMAICA

System One - High Net Cost Agencies

JUNE 1997

Agencies with Net Booking Costs > 6.00 per Segment & Total Cost > 6.00

ARC/ID#	PseudoCity	Booked	Canceled	Net	Cost	PerNet	Co	Agency Name & City
9750006	-	75	70	5	134.00	26.80	AG	TRI STAR TRAVEL/ANTIGUA/S1 @
9750005	-	78	69	9	138.53	15.39	AG	WADADLI TRAVEL/AG/S1 @
9850012	-	100	70	30	181.96	6.07	BB	UNIVERSAL TRAVEL/S1 @
5854201	-	10	8	2	13.86	6.93	BS	MUNDYTOURS LTD/FREEPORT/S1 @
9860008	-	6	6	0	11.46	-----	GD	JOYS TRAVEL/GD/S1 @
9860003	-	8	8	0	15.28	-----	GD	M AND C TRAVEL/S1 @
5960012	-	16	14	2	27.86	13.93	GT	JIM BACHUS TVL SVC LTD/GEORGETOWN GT/S1 @
0072049	-	12	9	3	22.11	7.37	LC	TRAVEL WORLD/CASTRIES ST LUCIA LC/S1 @
9350088	-	16	12	4	29.48	7.37	TT	FIRST CLASS TRAVEL/S1 @
9352862	-	28	20	8	51.32	6.42	TT	TRAVEL HOUSE LTD/S1 @
0072350	-	4	4	0	7.37	-----	TT	YUKLAN S TRAVEL SERVICE/POS/S1 @
3354579	-	4	4	0	6.96	-----	US A AND S	WORLD TRAVEL/S1 @ NY
1053174	-	9	9	0	15.66	-----	US	A NEW TRAVEL PARTNER INC/ORLANDO FL/S1 @ FL
0366467	-	4	4	0	6.96	-----	US	A WORLD OF TRAVEL LTD/MESA AZ/S1 @ AZ
0654586	-	4	4	0	6.96	-----	US	ABSOLUTE TVL AND ADVENTURE/S1 @ CO
1079699	-	37	30	7	59.13	8.45	US	ACCENT TRAVEL AND TOURS/WINTER HAVEN/S1 @ FL
4296138	-	4	4	0	6.96	-----	US	ADVENTURE IN TRAVEL/CHS/S1 @ SC
2187129	-	10	10	0	17.40	-----	US	ADVENTURE VACATIONS/HUNT VALLEY MD/S1 @ MD
3151681	-	56	41	15	93.39	6.23	US	AIR LAND TRAVEL/BROWNSMILLS NJ/S1 @ NJ
0667101	-	28	28	0	48.72	-----	US	AJA TRAVEL/DENVER CO/S1 @ CO
2151932	-	12	10	2	14.78	7.39	US	ALADDIN TRAVEL AGY INC/ANNAPOLIS MD/S1 @ MD
4977192	-	7	7	0	11.10	-----	US	ALL SEASONS TVL/KILMARNOCK VA/S1 @ VA
1064645	-	8	8	0	13.92	-----	US	ALL STAR TRAVEL INC/LEHIGH ACRES FL/S1 @ FL
0074626	-	11	9	2	16.72	8.36	US	AMBASSADOR TRAVEL SVCS INC/MLA/S1 @ FL
1053350	-	4	4	0	6.96	-----	US	AMERICAN INTERNATIONAL TVL/CLW/S1 @ FL
1052281	-	10	8	2	15.92	7.96	US	APPLE TRAVEL/WEST MIAMI FL/S1 @ FL
4566732	-	25	20	5	37.02	7.40	US	ARBOR TRAVEL WESTCHASE/HOUSTON TX/S1 @ TX
0065867	-	6	6	0	10.44	-----	US	AROUND THE WORLD TRAVEL/RIC/S1 @ VA
0653508	-	10	10	0	14.08	-----	US	ARVADA WEST TRAVEL AND CRUISE/ARVALA/S1 @ CO
1054326	-	7	18	-11	13.26	-----	US	ASTRO TRAVEL/TIH/S1 @ FL
1176569	-	4	4	0	6.96	-----	US	ATLANTA COMPANY TRAVEL/S1 @ GA
1186282	-	4	4	0	6.96	-----	US	ATLANTA INTERNATIONAL TRAVEL/ATL/S1 @ GA
1154584	-	45	43	2	72.63	36.32	US	ATLAS TRAVEL INC/DORAVILLE GA/S1 @ GA
3188491	-	8	12	-4	11.24	-----	US	BARCLAY TRAVEL/MOUNT LAUREL NJ/S1 @ NJ

0770657	8	10	-2	14.46	-----	US WANDAS TRAVEL/BRIDGEPORT CT/S1 @ CT
3173466	52	56	-4	91.56	-----	US WARDERS EDGE TRAVEL/FAIRHAVEN NJ/S1 @ NJ
3486196	12	30	-18	23.86	-----	US WAYNE MULLIS TRAVEL/SALISBURY NC/S1 @ NC
3967137	4	4	0	6.96	-----	US WESTMINSTER TRAVEL/LANSDOWNE PA/S1 @ PA
1063328	8	7	1	12.84	12.84	US WORLD CLASS TRAVEL SVC/GNV/QS @ FL
1160590	10	10	0	12.70	-----	US WORLD EXPLORERS/ATLANTA GA/S1 @ GA
3366277	10	10	0	17.40	-----	US WORLD TRADE TRAVEL/NEW YORK NY/S1 @ NY
5294306	4	6	-2	7.50	-----	US WORLD TRAVEL SERVICE/MILWAUKEE WI/S1 @ WI
1157761	2141	1585	556	3455.19	6.21	US WORLD TRAVEL/ATLANTA GA/S1 @ GA
4951535	8	8	0	13.92	-----	US WORLDNET TRAVEL/RICHMOND VA/S1 @ VA
1094638	25	23	2	25.32	12.66	US WORLDWIDE TRAVEL SERVICES/MIA/S1 @ FL
4259499	28	22	6	45.22	7.54	US YOUR TRAVEL AGENT INC/GSP/S1 @ SC
1455125	80	83	-3	117.93	-----	US YOUR TRAVEL AGENT/NILES IL/S1 @ IL
2151617	-	20	18	2	33.72	16.86 US YOUR TRAVEL AGT OF BELTSVILLE/S1 @ MD
0073618	-	4	4	0	6.96	----- US YUNI TRAVEL/FLUSHING NY/S1 @ NY

Totals: 954 Net Segments from 284 Agencies at a cost of 16705.66

The average cost per net segment booked is 17.51

Sound Technologies, Inc.
Comments to the Department of Transportation

Exhibit of Example of Agency Churning

Churning as it relates to an agencies booking activity may be defined as booking and canceling on the same day with the same passenger and often the same itinerary. This type of activity has no value to an airline reservations. All it accomplishes is driving up the cost segment fees. Other churning activity will have adverse effect on an airlines inventory. An agency who books on one day and cancels beyond the 24 hour ticketing rule is in violation of that airlines ticketing rules and further may cause an airline to close its inventory availability as that booking could cause the availability of seats to be exhausted.

Please note on the examples attached that these agencies are booking and canceling the same passenger.

Sound Technologies Inc. AGRPT Version 4.0 - Mon Oct 06 14:38:33 1997

AIR JAMAICA

System One Detail for ARC/IATA #0693900

JUNE 1997

(US - COURTESY TVL AND CRUISE INC/DEN/S1)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	C1	Stat	Acc	TrDate	Locatr
0056	ATLMBJ	970721	BRITO/DELLA	2	0.54	K C	HKXX	XX	970616	G45JGT
0056	ATLMBJ	970721	BRITO/DELLA	2	2.94	K B	NNHK	DA	970616	G45JGT
0056	ATLMBJ	970721	BRITO/DELLA	2	2.94	Q B	NNHK	DA	970616	G45JGT
0056	ATLMBJ	970721	BRITO/DELLA	2	0.54	Q C	HXXX	XX	970618	G45JGT
0031	MBJMIA	970801	BRITO/DELLA	2	2.94	Q B	NNHK	DA	970616	G45JGT
0031	MBJMIA	970801	BRITO/DELLA	2	0.54	Q C	HXXX	XX	970618	G45JGT
0057	MBJATL	970801	BRITO/DELLA	2	0.54	K C	HKXX	XX	970616	G45JGT
0057	MBJATL	970801	BRITO/DELLA	2	2.94	K B	NNHK	DA	970616	G45JGT

Sound Technologies Inc. AGRPT Version 4.0 - Mon Oct 06 14:38:50 1997

AIR JAMAICA

System One Detail for ARC/IATA #3963200

JUNE 1997

(US - DRESHER TRAVEL/MAPLE GLEN PA/S1)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	C1	Stat	Acc	TrDate	Locatr
0018	PHLMBJ	970603	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970602	G454XX
0324	MBJNEG	970603	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970602	G454XX
0018	PHLMBJ	970605	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970602	G454XX
0018	PHLMBJ	970605	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970605	G454XX
0324	MBJNEG	970605	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970602	G454XX
0324	MBJNEG	970605	DIPRINZIO/E	2	0.54	Y C	HXXX	XX	970605	G454XX
0018	PHLMBJ	970618	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970605	G454XX
0018	PHLMBJ	970618	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970606	G454XX
0324	MBJNEG	970618	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970605	G454XX
0324	MBJNEG	970618	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970606	G454XX
0018	PHLMBJ	970805	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970606	G454XX
0324	MBJNEG	970805	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970606	G454XX

Sound Technologies Inc. AGRPT Version 4.0 - Mon Oct 06 14:37:46 1997

AIR JAMAICA

System One Detail for ARC/IATA #2187129

JUNE 1997

(US - ADVENTURE VACATIONS/HUNT VALLEY MD/S1)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	Cl	Stat	Acc	TrDate	Locat:
0040	BWIMBJ	970714	ENTSMINGER/	2	2.94	Z B	NNHK	DA	970612	ENO5H
0040	BWIMBJ	970714	ENTSMINGER/	2	0.54	A C	HKXX	XX	970625	ENO5H
0040	BWIMBJ	970714	ENTSMINGER/	4	1.08	Z C	HKXX	XX	970625	ENO5H
0040	BWIMBJ	970714	ENTSMINGER/	2	2.94	A B	NNHK	DA	970625	ENO5H
0040	BWIMBJ	970714	ENTSMINGER/	2	2.94	Z B	NNHK	DA	970625	ENO5H
0041	MBJBWI	970718	ENTSMINGER/	2	2.94	Z B	NNHK	DA	970612	ENO5H
0041	MBJBWI	970718	ENTSMINGER/	2	0.54	A C	HKXX	XX	970625	ENO5H
0041	MBJBWI	970718	ENTSMINGER/	2	0.54	Z C	HKXX	XX	970625	ENO5H
0041	MBJBWI	970718	ENTSMINGER/	2	2.94	A B	NNHK	DA	970625	ENO5H

Sound Technologies Inc. AGRPT Version 4.0 - Mon Oct 06 14:41:45 1997

AIR JAMAICA

System One Detail for ARC/IATA #1160590

JUNE 1997

(US - WORLD EXPLORERS/ATLANTA GA/S1)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	C1	Stat	Acc	TrDate	Locatr
0058	ATLMBJ	970612	HARPER/JOHN	1	0.27	Y C	GKXK	XX	970604	GL0R0P
0057	MBJATL	970617	HARPER/JOHN	1	0.27	Y C	GKXK	XX	970604	GL0R0P
0058	ATLMBJ	970612	HARPER/KATH	1	1.00	Y B	GKGK	PS	970604	GL0R0P
0057	MBJATL	970617	HARPER/KATH	1	1.00	Y B	GKGK	PS	970604	GL0R0P
0058	ATLMBJ	970707	HOLLAND/MAR	1	1.00	Y B	GKGK	PS	970626	GYJS4D
0058	ATLMBJ	970707	HOLLAND/MAR	1	0.27	Y C	GKXK	XX	970626	GYJS4D
0059	MBJATL	970714	HOLLAND/MAR	1	1.00	Y B	GKGK	PS	970626	GYJS4D
0059	MBJATL	970714	HOLLAND/MAR	1	0.27	Y C	GKXK	XX	970626	GYJS4D
0058	ATLMBJ	970613	SHADEED/DAN	1	1.00	Y B	GKGK	PS	970605	GV1BEZ
0058	ATLMBJ	970613	SHADEED/DAN	1	0.27	Y C	GKXK	XX	970605	GV1BEZ
0057	MBJATL	970620	SHADEED/DAN	1	1.00	Y B	GKGK	PS	970605	GV1BEZ
0057	MBJATL	970620	SHADEED/DAN	1	0.27	Y C	GKXK	XX	970605	GV1BEZ
0058	ATLMBJ	970708	TRIMBLE/CAR	1	1.00	Y B	GKGK	PS	970626	G1MNNT
0058	ATLMBJ	970708	TRIMBLE/CAR	1	0.27	Y C	GKXK	XX	970626	G1MNNT
0057	MBJATL	970715	TRIMBLE/CAR	1	1.00	Y B	GKGK	PS	970626	G1MNNT
0057	MBJATL	970715	TRIMBLE/CAR	1	0.27	Y C	GKXK	XX	970626	G1MNNT
0058	ATLMBJ	970611	VETETO/LANE	1	1.00	Y B	GKGK	PS	970603	FGVPWT
58	ATLMBJ	970611	VETETO/LANE	1	0.27	Y C	GKXK	XX	970603	FGVPWT
0059	MBJATL	970625	VETETO/LANE	1	1.00	Y B	GKGK	PS	970603	FGVPWT
0059	MBJATL	970625	VETETO/LANE	1	0.27	Y C	GKXK	XX	970603	FGVPWT

Sound Technologies, Inc.
Comments to the Department of Transportation

Exhibit of Example of Suspect Passengers

The attached Suspect Passenger Report shows how agencies will book segments using suspect names.

Often reports will reflect Mouse/Mickey; Mouse/Minnie; Weiser/Bud; Test/; NoName; or TBA. These booking activities are performed mostly for training purposes. Although each CRS system has a training mode, their subscribers are not advised to use it for training activity.

As these suspect passenger names would never be accepted at an airport check in position, these bookings are worthless. The airline is forced to accept segment fees for these type transactions.

AIR JAMAICA

System One - Suspect Passenger Name Report

JUNE 1997

Flt	Cities	SgDate	Pasenger	Cost	Cl	stat	Access	Loadatr	TrDate	ARC/IAT	Pseudoty	Agency
0058	ATLMBJ	971001	TEST/GEORGE	5	1.35	Z	HICK	C	XX HICKBD	970606	US	1153573
0058	ATLMBJ	971001	TEST/BARNEY	5	7.35	Z	NNEK	B	DA HICKBD	970606	US	1153573
0058	ATLMBJ	971023	TEST/BARNEY	2	0.54	Q	HICK	C	XX HIDK53	970611	US	1153573
0058	ATLMBJ	971023	TEST/BARNEY	2	2.40	Q	NNEK	B	PA HIDK53	970611	US	1153573
0016	JFKIN	970701	TEST/LUIS	1	0.27	M	HICK	C	XX GYSACR	970605	US	3387895
0016	JFKIN	970701	TEST/LUIS	1	1.47	M	NNEK	B	DA GYSACR	970605	US	3387895
0016	JFKIN	970705	TEST/MIRTH	2	2.94	M	NNEK	B	DA ELYX2D	970623	US	3387895
0010	JFKOBJ	970702	TEST/P/M	2	2.94	M	NNEK	B	DA GKOBYB	970610	US	3361372
0010	JFKOBJ	970702	TEST/P/M	2	0.54	M	HICK	C	XX ETRLCP	970611	US	3361372
0010	JFKOBJ	970908	DOE/JOHN	2	2.94	Z	NNEK	B	DA ETRLCP	970623	US	3366050
0010	JFKOBJ	970908	DOE/JOHN	2	0.54	Z	HICK	C	XX ETRLCP	970625	US	3366050
0017	KINJFK	970720	TEST/LUIS	1	0.27	M	HICK	C	XX GYSACR	970605	US	3387895
0017	KINJFK	970720	TEST/LUIS	1	1.47	M	NNEK	B	DA GYSACR	970610	US	3387895
0015	KINJFK	970830	TEST/MIRTH	2	2.94	M	NNEK	B	DA ELYX2D	970623	US	3387895
0059	MBJATL	971008	TEST/GEORGE	5	1.35	Z	HICK	C	XX HICKBD	970616	US	1153573
0059	MBJATL	971008	TEST/GEORGE	5	7.35	Z	NNEK	B	DA HICKBD	970616	US	1153573
0059	MBJATL	971027	TEST/BARNEY	2	0.54	Q	HICK	C	XX HIDK53	970611	US	1153573
0059	MBJATL	971027	TEST/BARNEY	2	2.40	Q	NNEK	B	PA HIDK53	970611	US	1153573
0059	MBJATL	971027	TEST/BERNAR	2	0.54	Q	TICK	C	XX HIDK53	970613	US	1153573
0011	MBJJK	970617	TEST/P/M	2	2.94	B	NNEK	B	DA GKOBYB	970610	US	3361372
0011	MBJJK	970617	TEST/P/M	2	0.54	B	HICK	C	XX GKOBYB	970611	US	3361372
0011	MBJJK	970914	DOE/JOHN	2	2.94	Z	NNEK	B	DA ETRLCP	970623	US	3366050
0011	MBJJK	970914	DOE/JOHN	2	0.54	Z	HICK	C	XX ETRLCP	970625	US	3366050
0019	MBJPHL	970817	NONAME/A	1	1.47	M	NNEK	B	DA FBTEBP	970618	US	3170340
0018	PHLBJB	970807	NONAME/A	1	1.47	H	NNEK	B	DA FBTEBP	970618	US	3170340
0073	PTKIN	970712	TEST/ONE	1	0.27	H	HICK	C	XX FIRLIL	970613	JM	8571051
0073	PTKIN	970712	TEST/ONE	1	1.37	H	LIEK	B	PA FIRLIL	970613	JM	8571051

This report represents 58 segments costing

51.68

Sound Technologies, Inc.
Comments to the Department of Transportation

Exhibit of Examples of Fictitious Passenger Names

Another booking activity that causes adverse effect on an airlines inventory are speculative bookings. In this case, the agency is attempting to block space. An audit trail is to look for bookings that have the passenger surname with a backspace/ sign , a character, /another character/and another character.

Such that the booking could look like Jones/A/B/C/D with multiple passenger count and related segment fee charges. If these speculative bookings are never ticketed or canceled, this will contribute to an airlines NO SHOWs (empty seats upon departure). The value of this abusive activity is far more expensive to the airline as their revenue is reduced by the value of the abusive booking.

AIR JAMAICA

System One - Fictitious Passenger Name Report

JUNE 1997

Pkt Cities	Seat Passenger	Cost	C1	Stat	Access	Locatn	TrDate	ARC/LAT	PseudCity	Agency
0056 ATLMBJ	RUBY/R/M/V	5	2.75	B	NNPN B	RQ HOM20F	970617	US	1150637	- JAMPORT TRAVEL/DECATOR GA/S1 & GA
0058 ATLMBJ	KOW/M/K	2	0.54	Z	HROK C	XX HERRKV	970606	US	1157761	- WORLD TRAVEL/ATLANTA GA/S1 & GA
0056 ATLMBJ	SHIELDS/B/J	2	2.94	B	NNEK B	DA HFRV5IH	970611	US	4955256	- BAY WORLDWIDE TRAVEL/NEWPORT NEWS/S1 & VA
0058 ATLMBJ	BLAKSLEE/A/	4	4.80	H	NNEK B	PA EP2YQD	970612	US	1353171	- TRAVEL AGENTS INT'L/TWIN FALLS ID/S1 & ID
0058 ATLMBJ	CHUNG/A/B/C	4	5.88	M	NNEK B	DA F3212N	970613	US	3452850	- TRAVEL AGENTS INTERNATIONAL/NC/S1 & NC
0058 ATLMBJ	LEE/A/B/C/D	4	5.88	M	NNEK B	DA F33APN	970613	US	3452850	- TRAVEL AGENTS INTERNATIONAL/NC/S1 & NC
0058 ATLMBJ	SAMUELS/S/C	2	1.10	K	NNPN B	RQ G12E2Z	970616	US	1150637	- JAMPORT TRAVEL/DECATOR GA/S1 & GA
0056 ATLMBJ	BOWLER/A/B/	5	7.35	B	NNEK B	DA G4XBRXJ	970620	US	3450482	- INTERNATIONAL TOURS/HICKORY NC/S1 & NC
0058 ATLMBJ	COTTON/A/B/B/	4	1.08	B	HROK C	XX GOACEN	970620	US	1163201	- DRUD HILLS TRAVEL/S1 & GA
0058 ATLMBJ	COTTON/A/B/B/	4	1.08	A	HREK C	XX GOACEN	970620	US	1163201	- DRUD HILLS TRAVEL/S1 & GA
0058 ATLMBJ	COTTON/A/B/B/	4	5.88	B	NNEK B	DA GOACEN	970620	US	1163201	- DRUD HILLS TRAVEL/S1 & GA
0058 ATLMBJ	COTTON/A/B/B/	4	4.80	M	NNEK B	PA GOACEN	970620	US	1163201	- DRUD HILLS TRAVEL/S1 & GA
0058 ATLMBJ	COTTON/A/B/B/	2	2.94	B	NNEK B	DA GONOUR	970625	US	3850770	- ABC'S OF TRAVEL AND CRUISES/PDX/S1 & OR
0056 ATLMBJ	SPECIALS/A/	2	0.54	B	HREK C	XX GONOUR	970626	US	3850770	- ABC'S OF TRAVEL AND CRUISES/PDX/S1 & OR
0056 ATLMBJ	970704 SPECIALS/A/	2	2.94	Z	NNEK B	DA GOKYR	970626	US	1157761	- WORLD TRAVEL/ATLANTA GA/S1 & GA
0056 ATLMBJ	970704 MANNING/D/T	2	0.54	B	HROK C	XX HAGZOB	970626	US	1150637	- JAMPORT TRAVEL/DECATOR GA/S1 & GA
0058 ATLMBJ	970812 BREPON/N/M	2	2.40	B	NNEK B	PA HAGZOB	970626	US	1150637	- JAMPORT TRAVEL/DECATOR GA/S1 & GA
0058 ATLMBJ	970812 BREPON/N/M	5	1.35	B	HREK C	XX G4XBRXJ	970627	US	3450482	- INTERNATIONAL TOURS/HICKORY NC/S1 & NC
0056 ATLMBJ	970705 BOWLER/A/B/	2	0.54	B	HREK C	DA FLIPZJ	970603	US	3382682	- EVERYDAY TRAVEL INC/MIDDLE ISLAND NY/S1 & NY
0090 BG1JFK	970608 BRIDGET/H/X	2	2.94	M	NNEK B	XX FLIPZJ	970604	US	3382682	- EVERYDAY TRAVEL INC/MIDDLE ISLAND NY/S1 & NY
0090 BG1JFK	970608 BRIDGET/H/X	2	0.54	M	HROK C	PA HP5ITY	970617	US	1063251	- FIVE STAR TTVL/JACKSONVILLE FL/S1 & FL
0091 BG1JFK	970810 MAJO/A/B	3	3.60	B	NNEK B	PA HAGZOB	970610	US	1065687	- FORT MYERS TRAVEL AGENCY INC/FLY/S1 & FL
0092 BG1MIA	970808 SINGH/J/NAT	2	2.94	B	NNEK B	XX HAGZOB	970626	US	1150637	- JAMPORT TRAVEL/DECATOR GA/S1 & GA
0090 BG1MIA	970826 BREPON/N/M	2	0.54	B	HROK C	PA HAGZOB	970626	US	1150637	- JAMPORT TRAVEL/DECATOR GA/S1 & GA
0090 BG1MIA	970826 BREPON/N/M	2	2.40	B	NNEK B	PA HMCOTF	970602	US	2173501	- UNIGLOBE BUSINESS PLUS TRAVEL/FT WASH/S1 & AD
0040 BR7MBJ	970710 KORHIE/A/MAR	2	2.40	Z	NNEK B	DA GOTEZQ	970620	US	1050344	- PLACES TO GO/FL/S1 & FL
0040 BR7MBJ	SANDY/C/B/V	4	5.88	Z	NNEK B	DA GUTHEK	970617	US	1050344	- OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0040 BR7MBJ	970821 SANDY/C/B/V	2	2.94	Y	NNEK B	DA FCDD051	970624	US	2177938	- OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0040 BR7MBJ	970627 JONES/A/B	2	0.54	B	PNKQ C	XX FCDD051	970624	US	2177938	- OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0040 BR7MBJ	970627 JONES/A/B	2	2.40	B	NNEK B	RQ FCDD051	970624	US	2177938	- TRAVEL UNLIMITED/KIN/S1 & NJ
0040 BR7MBJ	970627 JONES/A/B	3	4.92	N	NNEK B	DA HANHCK	970617	JM	8565142	- TRAVEL NETWORK/EWR/S1 & NJ
0018 ERTRIN	970715 FRANCIS/W/J	2	0.54	B	HROK C	XX EQQ2VJ	970602	US	3152655	- TRAVEL NETWORK/EWR/S1 & NJ
0018 ERTRIN	970627 JONES/A/B	2	2.94	B	NNEK B	DA EQQ2VJ	970602	US	3152655	- TRAVEL NETWORK/EWR/S1 & NJ
0018 ERTRIN	970613 NOONAN/A/B	2	0.54	B	PNKQ C	DA ENQK5P	970602	US	3152655	- TRAVEL NETWORK/EWR/S1 & NJ
0018 ERTRIN	970613 NOONAN/A/B	2	1.10	B	SSPN B	DA ENVUDZ	970602	US	3152655	- TRAVEL NETWORK/EWR/S1 & NJ
0018 ERTRIN	970610 NOONAN/A/B/	3	4.92	N	NNEK B	DA ENQK5F	970603	US	3152655	- TRAVEL NETWORK/EWR/S1 & NJ
0018 ERTRIN	970815 NOONAN/A/B/	4	1.08	B	HROK C	DA GUTHEK	970620	US	3152655	- TRAVEL NETWORK/EWR/S1 & NJ
0018 ERTRIN	970810 NOONAN/A/B/	4	2.94	N	NNEK B	DA F2VPLR	970609	US	3152655	- J AND R TRAVEL WORLD/NEW YORK NY/S1 & NJ
0018 ERTRIN	970810 NOONAN/A/B/	4	1.08	B	NNEK B	DA GB2QD	970613	US	3352567	- ABC TRAVEL/WEST NEW YORK NY/S1 & NJ
0018 ERTRIN	970721 SHUTE/C/J	2	2.94	M	NNEK B	DA F2030X	970619	US	3174673	- J AND R TRAVEL WORLD/NEW YORK NY/S1 & NJ
0018 ERTRIN	970726 LAVALLE/J/M	6	8.82	Z	NNEK B	DA GIONER	970619	US	3352567	- J AND R TRAVEL WORLD/NEW YORK NY/S1 & NY
0018 ERTRIN	970828 ORTIZ/E/V/V	6	1.62	Z	HROK C	XX GIONER	970619	US	3352567	- J AND R TRAVEL WORLD/NEW YORK NY/S1 & NY
0018 ERTRIN	970830 ORTIZ/E/V/V	6	8.82	Z	NNEK B	DA GIONER	970619	US	3352567	- J AND R TRAVEL WORLD/NEW YORK NY/S1 & NY
0018 ERTRIN	970822 WILLIAMS/K/	2	2.94	M	NNEK B	DA HE01OP	970621	US	1050296	- ATLAS TOURS/S1 & FL
0018 ERTRIN	970627 MAZLERI/I/M	5	5.00	Y	GRKEK B	PS HOXST	970623	US	3180920	- CTN PLAZA TRAVEL/SOMERSET NJ/S1 & NJ
0018 ERTRIN	970624 JAST/T/R/E/	3	4.41	B	NNEK B	DA EOFIJJ	970623	US	3352567	- J AND R TRAVEL WORLD/NEW YORK NY/S1 & NY
0018 ERTRIN	970822 CURTINGS/A/	2	2.94	B	NNEK B	XX F2STT3	970630	US	3352567	- J AND R TRAVEL WORLD/NEW YORK NY/S1 & NY
0018 ERTRIN	970822 WILLIAMS/K/	2	0.54	Z	HROK C	DA F2STT3	970630	US	3352567	- J AND R TRAVEL WORLD/NEW YORK NY/S1 & NY
0018 ERTRIN	970822 WILLIAMS/K/	2	2.94	Z	NNEK B	DA F2STT3	970630	US	3352567	- J AND R TRAVEL WORLD/NEW YORK NY/S1 & NY
0018 ERTRIN	970822 WILLIAMS/K/	2	2.94	B	NNEK B	DA HROPPZ	970602	US	1050714	- DREAMSCAPE TVL INC/FL/S1 & FL
0088 FLIKIN	970620 BURKE/D/R	2	2.94	B	NNEK B	DA EXSMUP	970602	US	1061944	- RUN AWAY TRAVEL/FL/S1 & FL
0088 FLIKIN	970723 ARIOLA/A/B	2	1.62	M	HROK C	XX GTKDMB	970610	US	1090182	- STIRLING ROAD TRAVEL INC/HOLLYWOOD FL/S1 & FL
0088 FLIKIN	971218 JOHNSON/A/B	6	8.82	M	NNEK B	DA GRFTTF	970610	US	1090182	- MONDYTOURS LTD./FPO/S1 & FL
0088 FLIKIN	971218 JOHNSON/A/B	9	2.43	B	HROK C	XX F1L	970612	BS	5851000	-

Sound Technologies, Inc.
Comments to the Department of Transportation

Exhibit of Examples of Violations of
the Department of Transportation
Adequate Information Rule

In the Department of Transportation Computer Reservation (CRS) Regulations (Part 255) published on December 11, 1992, the Department of Transportation defined "adequate or minimum information that must be included for each segment.

The items to be required shall consist of the following for each segment: PNR record locator number, passenger name, booking status, agency ARC number, pseudo-city code, CRS transaction date, city pair information, flight number, flight date, class of service and type of CRS booking.

The following examples Invalid Flight Number report show Open Segment Bookings which reflect no Flight number and in some instances no flight date. These bookings are in violation of the adequate information rule as they do not contain a Flight Number or Flight date. There are no assurances that these open segments will ever be eventually utilized by the passenger to fly on the airline.

The other example of Non ARC IATA agencies depict bookings using a fictitious ARC or IATA number. As this report shows agency identification numbers of "999999999". This booking activity is in violation of the adequate information rule as they do not contain an ARC number.

AIR JAMAICA

Sabre - Invalid Flight Number Report

JUNE 1997

Flt CITIES	Date	Passenger	# CI	Stat	Access	Cost Locatt	ARC/TAT	Pcou. City	Agency
0000 MBJKIN	980117	ANDERSON/IDA	1	Y	DSDS B	ST	2.65	STJLTY 1089448 AM50	US PLANT CITY TRAVEL
0000 MCOMBJ	980117	ANDERSON/IDA	1	Y	DSDS B	ST	2.65	STJLTY 1089448 AM50	US PLANT CITY TRAVEL
0000 JFJKIN	971020	WILLIAMS/CAMPBELL/GLO	1	V	DSDS B	ST	2.65	TYHHRK 3352052 A402	US TRAVEL NETWORK
0000 JFJKIN	971020	WILLIAMS/CAMPBELL/GLO	1	B	DSDS B	ST	2.65	TYHHRK 3352052 A402	US TRAVEL NETWORK
0000 JFJKIN	971020	WILLIAMS/CAMPBELL/GLO	1	B	DSDS C	ST	-2.53	TYHHRK 3352052 A402	US TRAVEL NETWORK
0000 KINJFK	970909	FISLSP/COUTTNEY	1	V	DSDS B	ST	2.65	UVDIRY 3352493 ASPL	US ALERTON TRAVEL
0000 MBJEWK	000000	LEWIS/YVONNE	2	V	DSDS B	ST	5.30	RWZBRQ 3167840 A9N0	US GREENWALD TRAVEL
0000 MBJMIA	970815	LAWSON/GIOVANNYST	1	Y	DSDS B	ST	3.02	QDQMLU 5878888 BD12	TC PROVO TRAVEL
0000 MBJPLS	970712	WALTERS/LMRS/KENDES	2	Y	DSDS B	ST	6.04	SDSPVK 5878888 BD12	TC PROVO TRAVEL
0000 KINMBJ	970712	WALTERS/LMRS/KENDES	2	Y	DSDS B	ST	6.04	SDSPVK 5878888 BD12	TC PROVO TRAVEL
0000 PLSKIN	970816	PELLACHI/DAWANS	1	Y	DSDS B	ST	3.02	UVFRZR 5878888 BD12	TC PROVO TRAVEL
0000 MBJJFK	000000	BELL/MILICENT	2	V	DSDS B	ST	5.30	UTMTUK 3359272 B111	US CHARISMA TRAVEL
0000 KINJFK	000000	DALEY/SHAREKA	1	V	DSDS B	ST	2.65	RCWACC 3359272 B111	US CHARISMA TRAVEL
0000 JFJKIN	000000	BLACKWOOD/NERTELIN	1	V	DSDS B	ST	2.65	QEPOID 3359272 B111	US CHARISMA TRAVEL
0000 JFJKIN	970920	RICHARDS/KHAADIM	1	V	DSDS B	ST	2.65	QDHQTE 3359272 B111	US CHARISMA TRAVEL
0000 KINJFK	980226	HENRY/UNA	2	V	DSDS B	ST	5.30	RACESJ 3359272 B111	US CHARISMA TRAVEL
0000 KINJFK	980430	HENRY/UNA	2	V	DSDS B	ST	5.30	RACESJ 3359272 B111	US CHARISMA TRAVEL
0000 KINJFK	980430	HENRY/UNA	2	V	DSDS C	ST	-5.06	RACESJ 3359272 B111	US CHARISMA TRAVEL
0000 KINJFK	970820	DIGGS/ANGELLA	1	V	DSDS C	ST	-2.53	QFTGRD 3359272 B111	US CHARISMA TRAVEL
0000 JFJKIN	000000	BLACKWOOD/NERTELIN	1	V	DSDS C	ST	-2.53	QEPOID 3359272 B111	US CHARISMA TRAVEL
0000 KINJFK	980504	JONES/VERONICA	1	V	DSDS B	ST	2.65	QRKPTV 9999999 BO83	US RONNIE'S WORLD OF TVL AND TRS
0000 JFJKIN	971006	JACKSON/EVELYN	1	V	DSDS B	ST	2.65	SBRIQV 9999999 BO83	US RONNIE'S WORLD OF TVL AND TRS
0000 KINJFK	980407	REGISTER/CURLINE	1	V	DSDS B	ST	2.65	QSULTN 9999999 BO83	US RONNIE'S WORLD OF TVL AND TRS
0000 JFJKLMJ	971004	MCKINTLEY/ESTELLA	1	V	DSDS B	ST	2.65	TANRZZ 9999999 BO83	US RONNIE'S WORLD OF TVL AND TRS
0000 KINMIA	971201	GREEN/ENA	1	V	DSDS B	ST	2.65	SWSPLH 1064838 BW02	US JC TRAVEL
0000 KINMIA	971201	GREEN/ENA	1	V	DSDS C	ST	-2.53	SWSPLH 1064838 BW02	US JC TRAVEL
0000 KINEWR	000000	GAYLE/JAVAN	1	V	DSDS B	ST	2.65	QLEPZXX 0789082 B1J0	US USTRAVEL
0000 JFJKIN	971111	POWELL/MARION	1	V	DSDS B	ST	2.65	TNWYTN 3351040 B3L3	US AMERICAN TOURS LTD
0000 JFJKIN	971023	POWELL/MARION	1	V	DSDS B	ST	2.65	TNWYTN 3351040 B3L3	US AMERICAN TOURS LTD
0000 JFJKIN	971111	POWELL/MARION	1	V	DSDS C	ST	-2.53	TNWYTN 3351040 B3L3	US AMERICAN TOURS LTD
0000 KINJFK	971212	CHARLES/CRYSTALCED	1	V	DSDS B	ST	2.65	QEMIKA 3386436 B7I0	US CARIBBEAN-AMERICAN TRAVEL #1
0000 JFROVF	980220	JBAPTISTE/CASTILDA	1	Y	DSDS C	ST	-2.53	TSJYUO 3386436 B7I0	US CARIBBEAN-AMERICAN TRAVEL #1
0000 UVFJK	970716	GOREMIS/NIKIMISS	1	V	DSDS B	ST	2.65	THIXIS 3162792 B970	US NATIONAL TRAVEL SERVICE

-BDL-BDL

AIR JAMAICA

Sabre - Invalid Itata/Arc Agency Summary

JUNE 1997

Agencies With Activity of at least 1 Gross Segments						
Co	Seg#	Cost	ARC/ITATA	PseudCity	Agency Name @ City	Gross Segments
AG	22	8.24	9999999	F6J4	CARIB WORLD TRAVEL @ ANTIGUA	
AG	10	27.50	9999999	NUT4	CARIB WORLD TRAVEL @ ANTIGUA	
AN	4	12.08	9999999	G9T4	TRAVEL PLANNERS LTD @ ST. MAARTEN, N.A.	
AR	8	13.96	9999999	F1R4	NEXT TRAVEL AND BUSINESS S.R.L @ BUENOS AIRES	
AR	8	13.96	9999999	Z4F3	SONRISAS @ BUENOS AIRES	
AT	56	26.34	9999999	N523	EL-AL-CTO @ VIENNA	
AU	10	20.26	9999999	S6F4	BURPENGARY TRAVELWORLD @ BURPENGARY	
AU	8	0.56	9999999	I674	TRAVEL LINK AUSTRALIA @ MELBOURNE	
BS	27	37.54	9999999	EL14	RELIABLE TOURS AND TRAVEL LTD @ NASSAU BAHAMAS	
BZ	2	6.84	9999999	E6V4	ICB @ BELIZE CITY	
CA	4	0.24	9999999	3XX2	CARTA CONNECTION INC. @ TORONTO	
CA	27	71.95	9999999	9JR4	MIRAGE TRAVEL AND TOURS @ ETOBICOKE	
CA	4	12.20	9999999	NQ73	T.P.I. CANADA @ WINNIPEG	
CH	3	3.29	9999999	M4W3	BTS REISEN @ VOLKETSWIL	
CH	4	0.00	9999999	4TF3	GLOBE VOYAGES S.A @ PULLY	
CL	2	0.14	9999999	W2M4	CARLSON WAGONLIT/FAO @ SANTIAGO	
CL	8	27.36	9999999	CO34	MEGATOUR @ ARICA	
CO	5	3.70	9999999	X374	TROTAMUNDO @ CALI	
DE	8	0.00	9999999	B7K3	PAL FLUGREISEN @ BERLIN	
DO	2	0.14	9999999	H3U4	EDDYS TOURS @ REPUBLICA DOMINI	
DO	3	10.26	9999999	I174	NP TRAVEL @ SANTO DOMINGO	
FR	2	6.58	9999999	5AK1	QUASAR SEPLEXOR 2 @ PARIS	
FR	1	3.29	9999999	5FT1	QUASAR SUBEXPLOR 1 @ PARIS	
GB	16	-5.72	9999999	DR03	AIR FLAIR LTD @ LONDON	
GB	6	6.58	9999999	IQN2	AMERICAN EXPRESS @ CHISWICK, LONDON	
GB	2	0.00	9999999	W6G4	BAKERS DOLPHIN @ BRISTOL	
GB	4	13.17	9999999	W6H4	BAKERS DOLPHIN @ BRISTOL	
GB	2	5.90	9999999	N3V4	FARNLEY TRAVEL @ LONDON	
GB	3	9.88	9999999	S1Z4	STA TRAVEL LTD @ LONDON	
GY	79	82.58	9999999	AA83	MUNESHEWRS LTD TVL. SVC @ GEORGETOWN	
GY	4	13.68	9999999	BR93	WORLDWIDE TVL. SERVICE LIMITED @ GEORGETOWN	
HK	4	13.68	9999999	6GN3	GOODWAY TRAVEL LIMITED @ HONG KONG	
HT	12	41.04	9999999	L6E4	MULTIVISION TRAVEL @ PETIONVILLE, HAI	

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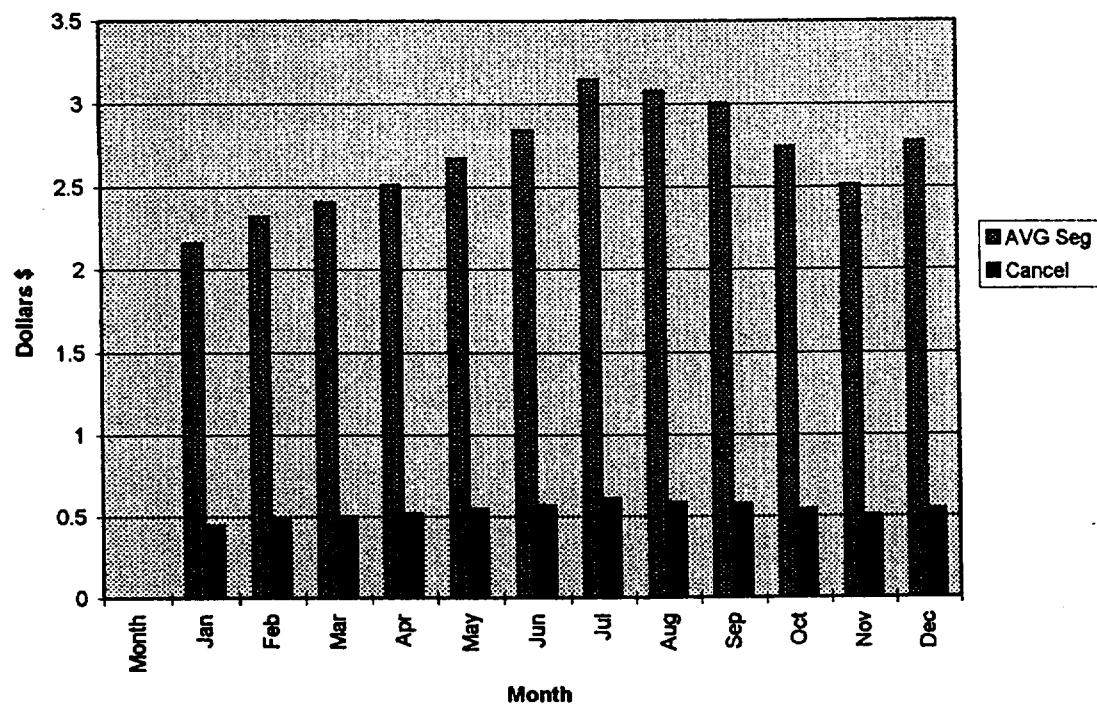
Exhibit Showing the Effect that
Cancelations Have on Transactional
Based Booking Practices.

The attached graph is based upon an Airlines actual CRS Segment Fee analysis. It was for the period January through December of 1993.

As you will note the higher the cancelation rate the higher the average segment fee cost.

**Analysis of Average Transaction Cost-Apollo
For the Year Ended December 31, 1993**

Month	AVG Seg Cost	Cancel %
Jan	\$ 2.16	44.61%
Feb	2.32	47.79%
Mar	2.41	49.87%
Apr	2.51	51.81%
May	2.67	54.60%
Jun	2.84	56.66%
Jul	3.15	60.64%
Aug	3.08	58.25%
Sep	3.00	57.27%
Oct	2.74	53.86%
Nov	2.51	50.37%
Dec	2.77	53.74%



**Analysis of Average Transaction Cost-Apollo
For the Year Ended December 31, 1993**

Month	AVG Seg Cost	Cancel %
Jan	\$ 2.16	44.61%
Feb	2.32	47.79%
Mar	2.41	49.87%
Apr	2.51	51.81%
May	2.67	54.60%
Jun	2.84	56.66%
Jul	3.15	60.64%
Aug	3.08	58.25%
Sep	3.00	57.27%
Oct	2.74	53.86%
Nov	2.51	50.37%
Dec	2.77	53.74%

